



# CANON CITY DISTRICT WILDERNESS

## Final Environmental Impact Statement

December 1987



Department of the Interior  
Bureau of Land Management  
Canon City District, Colorado



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1987



## United States Department of the Interior

## BUREAU OF LAND MANAGEMENT

COLORADO STATE OFFICE  
2850 YOUNGFIELD STREET  
LAKEWOOD, COLORADO 802151792  
(CO-050)BN

Dear Reader:

This is the final environmental impact statement (FEIS) on the wilderness recommendations for the Canon City District, Colorado. The draft environmental impact statement (DEIS) was distributed to the public on September 3, 1982.

This FEIS has been prepared by the Canon City District of the Bureau of Land Management (BLM) in accordance with the Federal Land Policy and Management Act of 1976. Specific guidance has been provided by the BLM Wilderness Study Policy, the National Environmental Policy Act (regulations in Federal Register, Vol. 43, No. 230, November 29, 1978), the Wilderness Act of 1964, and the BLM Planning Regulations (Federal Register, Vol. 48, No. 88, May 5, 1983).

This FEIS analyzes seven wilderness study areas (WSAs) in the Canon City District. The effects of designating or not designating each WSA as wilderness are analyzed and described. This FEIS includes comments received on the DEIS and the responses to these comments.

The Secretary will review this report and then submit his recommendations to the President by 1991. The President then has 2 years to submit his recommendations to Congress. Only Congress can decide which areas will be designated wilderness.

Thank you for your interest in this environmental statement.

Sincerely,

Neil F. Morck  
State Director



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**FINAL**  
**WILDERNESS ENVIRONMENTAL IMPACT STATEMENT**

**FOR THE**  
**CANON CITY DISTRICT**

**PREPARED BY**  
**CANON CITY DISTRICT**

**BUREAU OF LAND MANAGEMENT**  
**U. S. DEPARTMENT OF THE INTERIOR**

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State Director  
Colorado State Office



**WILDERNESS  
ENVIRONMENTAL IMPACT STATEMENT**

**For The**

**CANON CITY DISTRICT  
CANON CITY, COLORADO**

**Draft ( )    Final (X)**

**The United States Department of the Interior, Bureau of Land Management**

1. Type of Action:    Administrative ( )    Legislative (X)
2. Abstract: This final environmental impact statement (FEIS) analyses and describes the environmental, social, and economic effects of designating or not designating as wilderness seven wilderness study areas (WSAs) in the Canon City District. The study areas are Browns Canyon (CO-050-002), 6,614 acres; McIntyre Hills (CO-050-013), 16,800 acres; Lower Grape Creek (CO-050-014), 11,220 acres; Beaver Creek (CO-050-016), 26,150 acres; Upper Grape Creek (CO-050-017), 10,200 acres; Sand Castle (CO-050-135), 1,644 acres; and San Luis Hills (CO-050-141), 10,240 acres. The proposed action and alternatives analyze and compare various acreage for designation or nondesignation as wilderness. The all wilderness and no wilderness alternatives were considered for each WSA. In addition, a partial wilderness alternative was considered for Lower Grape Creek, Beaver Creek, and San Luis Hills WSAs. The Proposed Action, which was identified after the environmental analysis, recommends the entire Browns Canyon and 20,750 acres of the Beaver Creek WSA as preliminarily suitable for wilderness designation. The entire McIntyre Hills, Lower Grape Creek, Upper Grape Creek, Sand Castle, and San Luis Hills WSAs are recommended unsuitable for wilderness designation.
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4. Date Statement made available to EPA and to the public:  
Draft - September 3, 1982  
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# CANON CITY DISTRICT WILDERNESS FINAL ENVIRONMENTAL IMPACT STATEMENT

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## SUMMARY

This environmental impact statement (EIS) analyzes the effects of wilderness designation, nondesignation, and partial designation on seven wilderness study areas (WSAs) totaling 82,868 acres in the Canon City District. The following chart summarizes the proposed action for each WSA:

WSA	FLPMA Study Authority	Acres Suitable	Acres Nonsuitable
Browns Canyon (CO-050-002)	Sec. 603	6,614	0
McIntyre Hills (CO-050-013)	Sec. 603	0	16,800
Lower Grape Creek (CO-050-014)	Sec. 603	0	11,220
Beaver Creek (CO-050-016)	Sec. 603	20,750	5,400
Upper Grape Creek (CO-050-017)	Sec. 603	0	10,200
Sand Castle (CO-050-135)	Sec. 202	0	1,644
San Luis Hills (CO-050-141)	Sec. 603	0	10,240
	TOTAL	27,364	55,504

### BROWNS CANYON WSA (CO-050-002) - 6,614 acres

This WSA is located approximately 6 miles south of Buena Vista and 7 miles northwest of Salida in Chaffee County.

Elevation varies from about 7,500 feet near the Arkansas River to about 8,400 feet near the eastern boundary. Topography is very rugged with many mountains, hills, canyons, and gulches.

Vegetation throughout the area is sparse with pinon and juniper the most common vegetative types. Ground cover includes rabbitbrush, blue grama grass, mountain mahogany, Indian ricegrass, prickly pear cactus, and yucca.

The proposed action for the Browns Canyon WSA is the all wilderness alternative, which recommends the entire 6,614 acres for wilderness designation. This WSA has low mineral potential and no mineral exploration nor development is expected. The wilderness values would be preserved on the entire WSA.

A no wilderness alternative was also considered, which would not designate any of the 6,614 acres in the WSA as wilderness.

Issues analyzed for the Browns Canyon WSA include impacts on wilderness values, locatable mineral exploration and development, timber production, terrestrial wildlife habitat and population, and recreation use.

### MCINTYRE HILLS WSA (CO-050-013) - 16,800 acres

This WSA is located south of U.S. Highway 50 approximately 12 miles west of Canon City in Fremont County.

This WSA varies in elevation from about 5,900 feet near the Arkansas River to about 8,100 feet at some of the higher mountain tops such as McIntyre Hills. Topography varies from gently rolling hills and small plateaus to extremely rugged mountains. Vegetation consists primarily of pinon-juniper throughout the WSA with some pine and fir in the higher elevations.

The proposed action for the McIntyre Hills WSA is the no wilderness alternative, which recommends none of the 16,800 acres for wilderness designation. Wilderness values would be lost on 2,700 acres; however, the remaining 14,100 acres would probably remain undisturbed in the foreseeable future. This WSA has low mineral potential and as a result no mineral exploration nor development is expected. As a result of timber harvest and wildlife projects, livestock animal unit months (AUMs); wildlife population; and annual hunter days would increase.

An all wilderness alternative was also considered, which would recommend the entire 16,800 acres in the WSA for wilderness designation.

Issues analyzed for the McIntyre Hills WSA include impacts on wilderness values, locatable mineral exploration and development, forage production and livestock management, timber production, terrestrial wildlife habitat and population, and recreation use.

## SUMMARY

### LOWER GRAPE CREEK WSA (CO-050-014) - 11,220 acres

This WSA is located approximately 6 miles southwest of Canon City in Fremont and Custer Counties.

The WSA varies in elevation from 6,400 feet near Webster Park to an average of 8,300 feet on peaks near Goat Park. Topography is primarily rugged throughout the WSA; however, it becomes very steep and rugged on either side of Grape Creek. Approximately 4 miles of Grape Creek flow through the WSA. The stream and associated riparian vegetation and the canyon are the predominant features within the WSA.

The proposed action for the Lower Grape Creek WSA is the no wilderness alternative, which recommends none of the 11,220 acres for wilderness designation. Wilderness values would be lost on 4,800 acres; however, the remaining 6,420 acres would probably remain undisturbed in the foreseeable future. Although approximately 9,220 acres of the WSA have low mineral potential, 2,000 acres have moderate mineral potential with potential exploration possibly resulting in the development of one mine for base and precious metals. As a result of timber harvest and wildlife projects, livestock AUMs; wildlife populations; and annual hunting and fishing days would increase.

Two other alternatives were also considered: an all wilderness alternative, which would recommend wilderness designation of the entire 11,220 acres, and a partial wilderness alternative, which would recommend wilderness designation of 7,300 acres and nonwilderness designation of 3,920 acres.

Issues analyzed for the Lower Grape Creek WSA include impacts on wilderness values, locatable mineral exploration and development, forage production and livestock management, timber production, terrestrial and aquatic wildlife habitat and population, and recreation use.

### BEAVER CREEK WSA (CO-050-016) - 26,150 acres

This WSA is located 10 miles northeast of Canon City in Fremont, Teller, and El Paso Counties.

This WSA contains variations in topography from rough, rocky rolling hills in the southern portion to high, rugged, steep peaks over 9,000 feet in the northern portion. There are many deep canyon drainages. This is highly representative of the physical features of the Rocky Mountain Front Range in Colorado. The flora of this WSA varies from areas of

semiarid vegetation, to riparian areas along the stream, to conifer/pine forest mixes in the higher elevations. This WSA is unique in that it represents one of the few primitive/semiprimitive zones of its size along the southern Colorado Front Range that is undeveloped and unroaded.

The proposed action for the Beaver Creek WSA is Alternative C - Partial Wilderness—I, which recommends 20,750 acres to be designated wilderness and 5,400 acres not be designated wilderness. Under this alternative, wilderness values on all of the 20,750 acres recommended for wilderness designation would be preserved; however, wilderness values would be lost on about 120 acres of the 5,400 acres recommended as nonsuitable. Since the entire WSA has low mineral potential, no exploration nor development is expected. The only project that would occur in the WSA would be a timber harvest on 120 acres of the 5,400 acres not recommended for designation. All other values in the entire WSA would be maintained.

Three other alternatives were also considered: an all wilderness alternative, which would recommend designation of the entire 26,150 acres; a no wilderness alternative, which would not recommend wilderness designation of any of the 26,150 acres in the WSA; and a partial wilderness (Alternative D), which would recommend wilderness designation of 17,000 acres, and not recommend wilderness designation of 9,150 acres. Since the DEIS, the proposed action has been changed from Alternative D - Partial Wilderness Designation—II to Alternative C - Partial Wilderness Designation—I.

Issues analyzed for the Beaver Creek WSA include impacts on wilderness values, locatable mineral exploration and development, timber production, terrestrial wildlife habitat and population, and recreation use.

### UPPER GRAPE CREEK WSA (CO-050-017) - 10,200 acres

This WSA is located approximately 10 miles southwest of Canon City in Fremont and Custer Counties.

Elevation in this WSA varies from 7,000 to 8,100 feet. The western portion of the WSA contains rolling hills; the balance is mountainous with rugged, steep topography. Vegetation is rather sparse—mostly pinon and juniper. Approximately 7 miles of Grape Creek flow through the WSA and the stream and associated riparian vegetation and the canyon are the predominant features within the WSA.

The proposed action for the Upper Grape Creek WSA is the no wilderness alternative, which recommends none of the 10,200 acres for wilderness designation. Wilderness

## SUMMARY

values would be lost on about 2,545 acres; however, the remaining 7,655 acres would probably remain undisturbed in the foreseeable future. Since the entire WSA has low mineral potential, no exploration nor development is expected. As a result of timber harvest and wildlife projects, livestock AUMs; wildlife populations; and annual hunting and fishing days would increase.

An all wilderness alternative was also considered, which recommends wilderness designation of the entire 10,200 acres.

Issues analyzed for the Upper Grape Creek WSA include impacts on wilderness values, locatable mineral exploration and development, forage production and livestock management, timber production, terrestrial and aquatic wildlife habitat and population, and recreation use.

### SAND CASTLE WSA (CO-050-135) - 1,644 acres

This WSA consists of four parcels adjacent to the Great Sand Dunes Wilderness area in Alamosa County.

These parcels are made up of sandy soils with typical low-growing dune vegetation such as Indian ricegrass and sand dropseed. Elevation in the WSA varies from 7,700 to 9,400 feet.

The proposed action for the Sand Castle WSA is the no wilderness alternative, which recommends none of the 1,644 acres for wilderness designation.

Since this WSA has low mineral potential and no mineral exploration nor development is expected, and since no projects nor surface disturbing activities are planned, wilderness values would be preserved on the entire WSA for the foreseeable future, under this alternative, although no long-term protection would be provided.

An all wilderness alternative was also considered, which recommends wilderness designation of the entire 1,644 acres.

Since the DEIS, the proposed action has been changed from the all wilderness alternative to the no wilderness alternative.

Issues analyzed for the Sand Castle WSA include impacts on wilderness values, locatable mineral exploration and development, terrestrial wildlife habitat and population, and recreation use.

### SAN LUIS HILLS WSA (CO-050-141) - 10,240 acres

This WSA contains 10,240 acres of land located approximately 3 miles southeast of Manassa.

This WSA, located in the southeastern corner of the San Luis Valley, consists of a series of interconnected hills that rise from 7,700 feet at the surrounding valley floor to 9,300 feet at the highest point.

The proposed action for the San Luis Hills WSA is the no wilderness alternative, which recommends none of the 10,240 acres for wilderness designation.

Since this WSA has low mineral potential and no mineral exploration nor development is expected, and since no projects nor surface disturbing activities are planned, wilderness values would be preserved on the entire WSA for the foreseeable future, although no long-term protection would be provided.

Two other alternatives were also considered: an all wilderness alternative, which would recommend wilderness designation of the entire 10,240 acres, and a partial wilderness alternative, which would recommend designation of 7,440 acres and nonwilderness designation of 2,800 acres.

Issues analyzed for the San Luis Hills WSA include impacts on wilderness values, locatable mineral exploration and development, terrestrial wildlife habitat and population, and recreation use.

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**CHAPTER ONE**  
**PURPOSE AND NEED**



## CHAPTER 1 PURPOSE AND NEED

The purpose of the proposed action is to preserve an enduring resource of wilderness in the Browns Canyon WSA and on 20,750 acres of the Beaver Creek WSA. In the McIntyre Hills, Lower Grape Creek, Upper Grape Creek, Sand Castle, San Luis WSAs, and on 5,400 acres of the Beaver Creek WSA, public lands would be managed for other multiple uses.

Section 603(2) of the Federal Land Policy Management Act (FLPMA) directs the Secretary of the Interior and BLM to inventory public lands under its jurisdiction and identify those with wilderness characteristics. Those lands with wilderness characteristics must then be studied to determine suitability or unsuitability for wilderness designation. Based on an evaluation of wilderness and other resource use/values in each area determined to contain wilderness characteristics, the Secretary must report his recommendations to the President, no later than October 21, 1991, on whether areas should be designated as wilderness. The President must report his final recommendations to Congress within 2 years. Congress will decide whether or not any of the areas are to be designated wilderness.

Section 202 of FLPMA provides authority through the land use planning process to study and recommend areas for wilderness designation that are not covered under Section 603. Five wilderness study areas (WSAs) are being studied under this authority. Four of these—Black Canyon CO-050-131, South Piney Creek CO-050-132B, Papa Keal CO-050-137, and Zapata Creek CO-050-139—totaling 4,910 acres, are contiguous to a U.S. Forest Service WSA and are included in their study of the Sangre de Cristo Range. The 1,644-acre Sand Castle WSA is contiguous to the Great Sand Dunes Wilderness area administered by the National Park Service and will be studied in this environmental impact statement (EIS).

The potential impacts of designating or not designating seven WSAs totaling 82,868 acres in the Canon City District as part of the National Wilderness Preservation System are analyzed. Table 1-1 shows the areas included in this final environmental impact statement (FEIS). Map 1-1 shows the Sand Castle WSA being studied under Section 202 and the six WSAs studied under Section 603 in this document.

### CHANGES FROM THE DEIS

Chapter 5 (Consultation) has been added to this FEIS. This includes draft and final elements of the consultation and

coordination process. Comments received on the DEIS and the corresponding responses are also included in Chapter 5.

TABLE 1-1

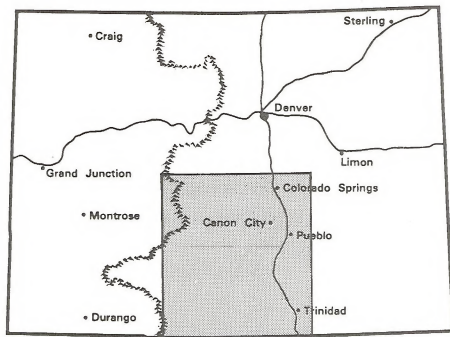
#### SEVEN WSAs ANALYZED IN THE CANON CITY DISTRICT WILDERNESS EIS

Unit No.	Name	Acres
CO-050-002	Browns Canyon	6,614
CO-050-013	McIntyre Hills	16,800
CO-050-014	Lower Grape Creek	11,220
CO-050-016	Beaver Creek	26,150
CO-050-017	Upper Grape Creek	10,200
CO-050-135	Sand Castle	1,644
CO-050-141	San Luis Hills	<u>10,240</u>
	TOTAL	82,868

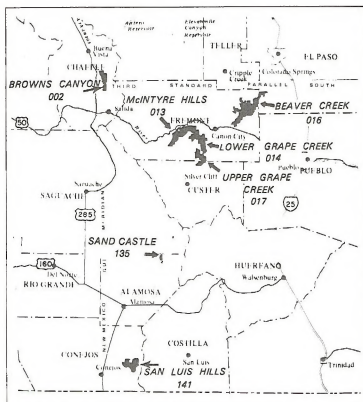
In the DEIS, two partial wilderness designation alternatives were considered for Beaver Creek to minimize potential resource conflicts. These included Alternative C (20,750 acres recommended suitable) and Alternative D (17,000 acres recommended suitable), which was the proposed action. Since the DEIS, further evaluation of the timber resource in this area has shown that much less timber is available than was previously thought. As a result of this, and substantial public comments supporting recommendation of the area as suitable, the proposed action has been changed to Alternative C. This would result in an additional 3,750 acres being recommended for designation.

An additional change in the proposed action concerns the Sand Castle WSA. Since the Sand Castle WSA (1,644 acres) is less than 5,000 acres, and is contiguous with the existing Great Sand Dunes Wilderness area, which is administered by the National Park Service, it is being studied under Section 202 of FLPMA. This WSA is made up of four separate parcels which are up to 6 miles apart. If designated wilderness, they would not provide logical additions to the existing Great Sand Dunes Wilderness boundary, but rather would add irregularly shaped and sometimes narrow extensions protruding from the existing wilderness. As a result, they would be difficult to administer as wilderness (see Map 2-10). In addition, Park Service staff have noticed higher levels of ORV use in and around the WSA than

### And Location of 7 WSAs in the Canon City District



COLORADO



## INVENTORY

either the Park Service or BLM personnel were previously aware. It would be difficult to exclude ORV use under wilderness designation because of boundary identification problems related to the shifting sands. Even fences are frequently buried by the moving dune formation.

As a result of these factors, the proposed action for this WSA has been changed from Alternative A - All Wilderness Designation to Alternative B - No Wilderness designation. This would result in 1,644 acres not being recommended for designation.

As a result of changes in the proposed actions for the Beaver Creek and Sand Castle WSAs, the total acreage recommended suitable in this FEIS is increased by 2,106 acres over the acreage identified as suitable in the draft EIS.

No other changes have occurred in the proposed action. In some other WSAs, however, alternatives analyzed in the draft EIS have been omitted from this document. A partial wilderness designation alternative was analyzed in the draft EIS for Upper Grape Creek, McIntyre Hills, and Sand Castle. In each case, this alternative would have eliminated small acreages (less than 10 percent) along the boundaries of the WSAs, which contained minor resource conflicts or imprints of man. In these cases, the analysis revealed only insignificant differences in impacts or in any values that warrant further consideration in this document. The impacts are completely covered in the all wilderness and the no wilderness alternative descriptions and there would be no significant reason to consider these partial alternatives. All other partial alternatives for other WSAs are carried forward in this document.

Some of the information in the appendices in the DEIS has been incorporated into this FEIS; however, some of the information is no longer needed. Therefore, the appendices section has been removed from this document.

To accomplish the mandate of Section 603 of FLPMA, BLM has developed a framework for the wilderness review process, which has three phases: inventory, study, and reporting.

## INVENTORY

During the inventory phase (1978 through 1980), all 1,201,375 acres of public land in the Canon City District were examined to determine the existence of wilderness resources. Particular areas or units of land (WSAs) were identified as having wilderness values. In determining these wilderness values, the law directs BLM to use the criteria given by Congress in the *Wilderness Act* of 1964. Section 2(c) of that act states: "A Wilderness, in contrast with those areas where man and his own works dominate the landscape,

is hereby recognized as an area where the earth and its community of life are untrammelled by man, where man himself is a visitor who does not remain. An area of wilderness is further defined to mean in this Act an area of undeveloped Federal land retaining its primeval character and influence, without permanent improvements or human habitation, which is protected and managed so as to preserve its natural conditions and which (1) generally appears to have been affected primarily by the forces of nature, with the imprint of man's work substantially unnoticeable; (2) has outstanding opportunity for solitude or a primitive and unconfined type of recreation; (3) has at least five thousand acres of land or is of sufficient size as to make practicable its preservation and use in an unimpaired condition; and (4) may also contain ecological, geographical, or other features of scientific, educational, scenic, or historic value."

These characteristics are explained in detail in the *Wilderness Inventory Handbook—Policy, Direction, Procedures, and Guidance for Conducting Wilderness Inventory on the Public Lands*; September 1978. This handbook is available in the Canon City District Office.

This inventory phase was completed for the Canon City District in November 1980. There were 87,778 acres in 11 WSAs with wilderness values. These findings were published in *BLM: Intensive Wilderness Inventory—Final Wilderness Study Areas*. In addition to the seven WSAs totalling 82,868 acres in the district (Map 1-2), four WSAs totalling 4,910 acres are being studied along with the U.S. Forest Service WSAs and were analyzed in the *U.S. Forest Service Wilderness EIS* for the Pike-San Isabel and Rio Grande National Forests. Currently 82,868 acres identified as WSAs and analyzed in this FEIS represent 7 percent of the total 1,201,375 acres in the district. The 27,364 acres recommended for wilderness designation represent 2 percent of total acres in the district.

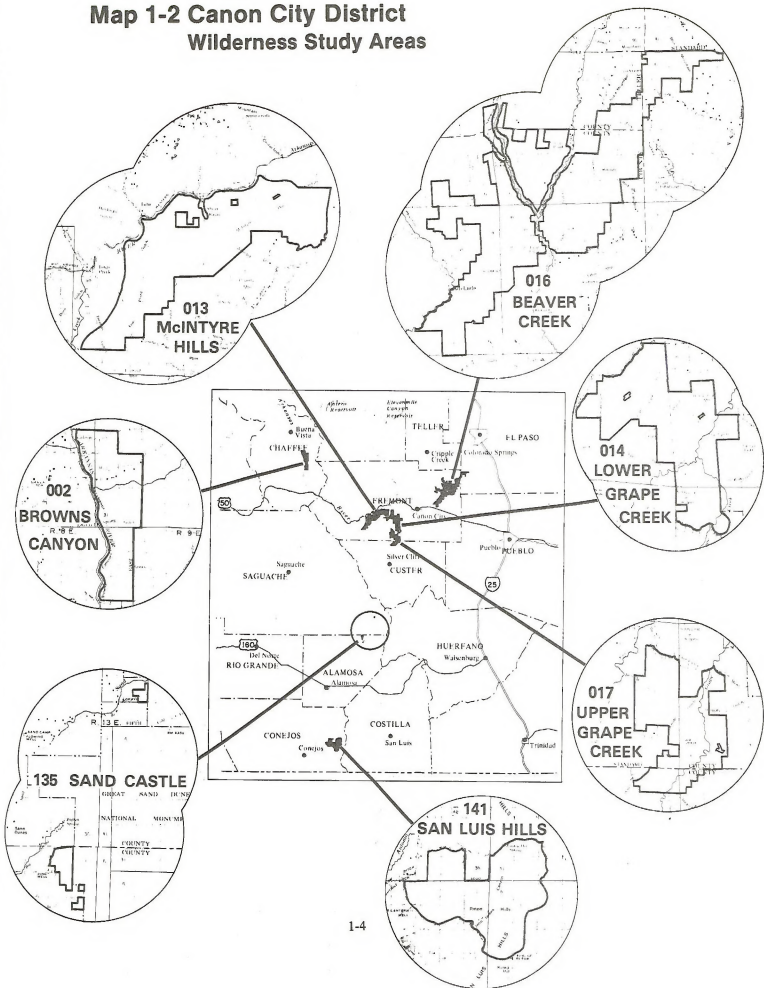
## STUDY

This phase involves the process of determining, through careful analysis, the wilderness study areas that will be recommended as suitable for wilderness designation and those that will be recommended as nonsuitable. These determinations, made through the BLM land use planning system, consider all values, resources, and uses of the public lands.

Recommendations concerning wilderness designation were not included in the Royal Gorge (1979) nor the San Luis (1973) and Saguache (1975) management framework plans (MFPs). Each of these land use plans is being amended to include a review of wilderness values including wilderness designation as required by FLPMA. In January 1986, work



## Map 1-2 Canon City District Wilderness Study Areas



## SCOPING

on the San Luis Resource Management Plan was initiated. When completed this plan will replace the San Luis and Saguache MFPs. It is being prepared in accordance with the BLM *Wilderness Study Policy* and the recommendations contained in this document. Guidance for the amendment process comes from the following sources: *Wilderness Study Policy*, the *National Environmental Policy Act* (regulations in F.R./Vol. 43, No. 230, November 29, 1978), the *Wilderness Act* of 1964, and the *BLM Planning Regulations* (published in 43 CFR 1600).

The plan amendment process for wilderness has various steps.

## SCOPING

Scoping determines environmental issues and alternatives to be addressed in the EIS. A total of 22 public scoping meetings and workshops were held to identify any new

issues, solicit resource data from the public, and explain the study procedures to be used. In addition the *Wilderness Study Policy* identified national issues and criteria.

Preliminary alternatives were developed and additional public workshops were held in January 1982 in Alamosa, Salida, Canon City, and Colorado Springs, Colorado. At these workshops the public was asked to comment on the preliminary alternatives and also to recommend any additional alternatives not addressed by the BLM.

## ISSUE IDENTIFICATION

BLM used the information obtained as a result of scoping meetings and workshops, comments received during the inventory process, and input from BLM professionals to identify concerns associated with the seven WSAs. Of these, the following were determined to be important issues and are analyzed in the FEIS. (See Table 1-2 Issues Analyzed by WSA.)

TABLE 1-2  
Issues Analyzed by WSA <sup>1</sup>

Impacts on:	WSAs						
	Browns Canyon	McIntyre Hills	Lower Grape Creek	Beaver Creek	Upper Grape Creek	Sand Castle	San Luis Hills
Wilderness Values	X	X	X	X	X	X	X
Locatable Mineral Exploration and Development	X	X	X	X	X	X	X
Forage Production and Livestock Management		X	X		X		
Timber Production	X	X	X	X	X		
Wildlife Habitat and Population Terrestrial	X	X	X	X	X	X	X
Wildlife Habitat and Population Aquatic			X		X		
Recreation Use	X	X	X	X	X	X	X

<sup>1</sup> An "X" indicates the issues analyzed for each WSA.

## CHAPTER 1 PURPOSE AND NEED

1. *Impacts on Wilderness Values* - The wilderness values of naturalness, the opportunities of solitude and primitive recreation, and various special features of the WSAs would benefit from wilderness designation. The same values may be adversely affected by uses and activities that would occur should the WSAs not be designated wilderness. The significance of these beneficial or adverse impacts is an issue that is analyzed in all WSAs. Diversity in the National Wilderness Preservation system will only be discussed for the San Luis Hills WSA since it is the only one that would add to the diversity of that system. Since there are only special features in the Lower and Upper Grape Creek WSAs and they would not be affected by wilderness designation or nondesignation, special features are only discussed in Chapter 3 for these two WSAs.

2. *Impacts on Mineral Exploration and Development* - If designated as wilderness, each WSA would be withdrawn from all forms of mineral entry, which would affect the potential exploration and development of energy and mineral resources in the WSAs. Oil and gas and salable minerals are not known to exist in any of the WSAs and are not an issue. The impact of wilderness designation on the development of potential and known locatable mineral resources is analyzed in all seven WSAs.

3. *Impacts on Forage Production and Livestock Management* - The *Wilderness Act* and the *BLM Wilderness Management Policy* allow livestock grazing to continue at historic levels established prior to wilderness designation. Livestock management improvements, in existence at the time of wilderness designation, may continue to be maintained after designation. Also new improvements could be constructed after designation if they are necessary and in accordance with the guidelines and management plans for the area and are primarily for the purposes of resource protection.

If an area is designated wilderness, the use of motorized vehicles to maintain existing range improvements would generally be precluded, but would continue to be allowed where no reasonable alternatives exist. Therefore, wilderness designation or nondesignation is not expected to significantly impact existing operations.

The impact of wilderness designation on forage production and livestock management would be primarily from restrictions on projects intended to increase livestock AUMs. These types of projects are only proposed in the McIntyre Hills, Lower Grape Creek, and Upper Grape Creek WSAs. Therefore, forage production and livestock management is only an issue for these three WSAs.

4. *Impacts on Timber Production* - Wilderness designation would impact timber production by prohibiting the harvest of firewood and sawtimber. Timber harvest projects are only proposed in the Browns Canyon, McIntyre Hills, Lower Grape Creek, Beaver Creek, and Upper Grape Creek

WSAs. Therefore, timber production is an issue for only these five WSAs.

5. *Impacts on Terrestrial Wildlife Habitat and Population* - Existing terrestrial wildlife habitat would be protected and wildlife populations would be maintained under wilderness designation. However, wildlife habitat and populations could be affected by resource management actions proposed or expected within the WSAs if not designated as wilderness. The impacts from all resource management actions proposed or expected within the WSAs were considered. If the total acreage of vegetation were manipulated as proposed by all resources, small game and nongame species composition and numbers would vary locally. However, composition and numbers would not significantly change in the long term because of the habitat diversity offered by public lands, the dispersed nature and size of each project, and the nature of disturbance in each project area.

Under no wilderness designation, a number of actions are projected that would affect mule deer, bighorn sheep, or turkey. These include vegetative manipulation, catchments, and spring development projects designed to improve wildlife habitat. Terrestrial wildlife habitat and populations are issues for each WSA.

6. *Impacts on Aquatic Wildlife Habitat and Population* - Generally the existing aquatic wildlife habitat would be protected and fish populations would be maintained under wilderness designation. There is no aquatic habitat in the Browns Canyon, McIntyre Hills, Sand Castle, or San Luis Hills WSAs. Although Beaver Creek flows through the Beaver Creek WSA, this stream is managed by the Colorado Division of Wildlife and they are not proposing any aquatic habitat improvement projects. In addition there are no other projects planned under any alternative that would affect Beaver Creek. However, there are aquatic habitat improvement projects proposed in both the Lower and Upper Grape Creek WSAs that would be precluded under wilderness designation. Therefore, aquatic wildlife habitat and subsequent fish populations are only an issue in these two WSAs.

7. *Impacts on Recreation Use* - Wilderness designation could affect recreational opportunities by precluding certain activities such as back-country vehicle use; however, it would maintain those opportunities that occur in a wilderness setting. If not designated, development activities could result in a change in the type of recreational use from those that occur in a wilderness setting to those affected by roads and other manmade intrusions. Therefore, the impact of designation or nondesignation on recreation use is an issue in all seven WSAs.

The following issues were identified in scoping, but were not selected for detailed analysis in this EIS. The reasons each of these issues is not analyzed further are as follows:

## ISSUE IDENTIFICATION

1. *Impacts on Air Quality* - Since the *Wilderness Management Policy* states that BLM will manage all wilderness areas to comply with the air quality classification for that specific area, wilderness designation or nondesignation would not cause the air quality classification to change. All WSAs have a Class II air quality classification. Concerns have been expressed, particularly about the Beaver Creek WSA, that if the unit is designated wilderness the air quality classification would be redesignated to Class I. BLM would not recommend reclassification of air quality standards in designated wilderness from the existing Class II to the more stringent Class I. Wilderness designation does not automatically require reclassification. Such a decision would be made by the state of Colorado, not BLM. In addition, no actions nor projects are proposed or anticipated in any of the WSAs that would not be within the constraints of the existing Class II air quality standards. Therefore, impacts on air quality is not an issue for any of the WSAs.

2. *Impacts on Cultural Resources* - At present, no significant historic properties (eligible for the National Register of Historic Places) are known to exist within the wilderness study areas included in this document. The likelihood of finding any is insignificant.

The Colorado Historical Society has concurred that generally wilderness designation of areas with cultural resource values of low significance is not adverse to cultural resources. Benefits usually occur since designation legally precludes development, land disturbances, motorized use, and other damaging or intrusive human effects. Most wilderness users tend to be sensitive to their environment and thus are far less likely to "pothunt" than others. Wilderness areas totally eliminate access by road and thus eliminate the use of vehicles or heavy equipment for vandalism purposes. A 1979 study (Nickens, et al., 1979) has confirmed that cultural sites more than one-half mile from a road are much less vandalized than those sites near a roadway.

Inventory procedure is well-established and is done whenever surface disturbance occurs in a noninventoried area. Mitigation for site loss or damage is normally done when a site qualifies for inclusion in the National Register of Historic Places. This is required by law. Mitigation can range from site excavation and analysis to site avoidance through project redesign. If an area is not designated wilderness, it will be opened to development such as oil and gas, roads, timber sales, and other surface disturbing activities. Such disturbances may cause destruction to significant cultural resources and can open up regions without previous access. Increased access can provide vandals and "pothunters" easy opportunity to loot and the damage to cultural resources can increase greatly. It should be noted, however, that most all development on the public lands requires inventory and mitigation for cultural resources, thus

providing legal protection, which occurs whether or not an area is designated as wilderness.

At the time a wilderness management plan is developed, procedures for the identification and protection of cultural resources will be considered as part of that process. This will include inventory, when appropriate, mitigation as needed, and consultation with the State Historic Preservation Officer as required under 36 CFR 800.4. In those cases where significant cultural values are known to exist, or are suspected to be present, the legislation that is developed must address access and scientific or educational uses that may be required.

Although concentrations of archeological artifacts have been identified adjacent to Browns Canyon and Sand Castle WSAs, no known cultural resources exist within any of the WSAs.

3. *Impacts on Economic Conditions* - Wilderness designation would preclude mineral exploration or development, except on valid existing claims, in all the WSAs. Currently there are no mining operations and, except for Lower Grape Creek, all the WSAs have low mineral potential. There is a favorable zone for base and precious metal exploration and possible development in the Lower Grape Creek WSA. It is estimated that a 5 percent increase in employment would be necessary to have a significant local and regional economic impact. It is not expected that mineral production of this proportion would occur in all of the WSAs combined if they are designated or not designated wilderness.

The net economic gain to the local and regional economy as a result of timber and forage production, wildlife habitat improvement projects, and recreational use would change by less than 1 percent as a result of wilderness designation or nondesignation of all WSAs. Therefore, the impacts on economic conditions were dropped from further analysis for all WSAs.

4. *Impacts to Threatened and Endangered Species* - Except for bald eagles and peregrine falcons, there are no known threatened and endangered plant or animal species in any of the WSAs. Bald eagles occur in the Royal Gorge Resource Area as winter visitors. Although peregrine falcons could stop in any of the WSAs during their migration, they are known to occur in the Beaver Creek WSA.

In correspondence with the U.S. Fish and Wildlife Service (FWS), they have stated that Section 7 of the *Endangered Species Act* requires that the Bureau review the actions they may authorize, permit, or construct, and determine whether Federally listed species will be affected. If the Bureau determines that a particular action "may affect" a Federally listed species, formal consultation with the Fish and Wildlife Service must be requested. The Act further states that if a Federal agency decides that its activities or

## CHAPTER 1 PURPOSE AND NEED

programs will not affect listed species or their habitat, consultation (with the U.S. Fish and Wildlife Service) shall not be initiated unless requested by the service. The Bureau will satisfy their responsibilities under the *Endangered Species Act* for each action that may potentially impact bald eagles or peregrine falcons residing within the wilderness study areas.

No actions are proposed or anticipated in the Beaver Creek WSA that would affect peregrine falcons, regardless of wilderness designation. Under the no wilderness alternative, the only activities proposed in the WSA are timber harvest projects. The closest project would be over a mile from any nesting sites and is not expected to impact the peregrine falcons. However, due to the likelihood that peregrine falcons may occur in the Beaver Creek Wilderness Study Area, the Bureau will implement the Peregrine Falcon Recovery Plan, as appropriate. In addition, prior to permitting or conducting any activities within a 10-mile radius of a suspected peregrine falcon nesting site, which may affect the peregrine falcons, BLM will formally consult with the U.S. Fish and Wildlife Service.

It is recognized that several plant taxa that have been classified as FWS category 2 species under the *Endangered Species Act* have been identified to occur, or potentially occur, within the WSAs. Bureau policy dictates that species listed by FWS as candidate species for inclusion under the *Endangered Species Act* be afforded the same protection as a formally listed species to the extent possible. The following WSAs may contain plant taxa as below.

- McIntyre Hills WSA, *Penstemon degeneri* is known to occur. This species may also occur in the Lower and Upper Grape Creek WSAs but further field inventories would have to be conducted to verify this supposition.

- Beaver Creek WSA, *Bolophyta tetraeneuris* is known to occur.

- Browns Canyon WSA, *Eriogonum brandegei* occurs adjacent to this WSA, and potentially could occur in the WSA.

Prior to any surface disturbing activities within these WSAs, the status of these plant taxa would be verified and necessary field inventories would be performed. Impacts would be avoided or mitigated regardless of wilderness designation or nondesignation. Although there is the possibility of inadvertent damage from recreation activities within these WSAs, there would be only minor increases in visitor use and no change in recreational use patterns. There is no evidence that damage has occurred and the likelihood of future damage is remote.

Therefore, this impact topic was dropped from further analysis for all WSAs in this FEIS.

### 5. Impacts on Water Resources

- *Impacts on Erosion and Sedimentation* - Only Lower Grape Creek, Beaver Creek, and Upper Grape Creek WSAs have streams. Although the other WSAs may have small temporary springs, they have no water source that could be affected by wilderness designation or nondesignation. In the Beaver Creek WSA, activities such as construction of primitive roads and other surface disturbing activities would occur outside the Beaver Creek watershed and, therefore, the influence on water quality is negligible. In the Lower and Upper Grape Creek WSAs, it is projected that up to 8.5 miles (13 acres) of primitive road, with mitigation measures to control erosion, would be constructed. These roads would provide access to timber harvest and wildlife catchment projects. Road construction would be expected to increase sediment loads and turbidity in Grape Creek only during snowmelt runoff or heavy rain. These increases would not be expected to violate state water quality standards. When compared to the existing turbidity and sediment loads that result from snowmelt or thunderstorms within the 204,800-acre Grape Creek watershed, the expected increase from these 13 acres would be too small to be measured.

ORV use is currently quite low in these WSAs and is not projected to increase if the WSAs are not designated wilderness. Virtually all this use would continue to occur on existing ways and trails. There is no discernible erosion nor sedimentation presently occurring as a result of this use and no change is expected.

Timber harvest and woodcutting activities in themselves result in temporary, low level ground disturbance. Slash and litter are left on the ground and form a protective cover. For these reasons, no measurable erosion and sediment production should result from the timber harvest. The water catchment project would result in almost no increase in sediment in Grape Creek.

Therefore, this impact topic was dropped from further analysis for all WSAs in this FEIS.

- *Impacts on Existing Water Rights* - Wilderness designation would not be expected to have a significant effect on any existing water rights in any of the WSAs. Both the *Wilderness Act* and Bureau of Land Management *Wilderness Management Policy* recognize valid existing rights. In the case of water rights, if any reserved water rights are determined to be established by the act of designation, the priority date of that right would be junior to all rights existing at the time of designation. It would, therefore, not pre-empt any existing water rights. Furthermore, maintenance of existing water control structures that existed under valid permits or other authority prior to designation could continue.



## ISSUE IDENTIFICATION

An issue that has been recently raised is whether there would be an impact of a reserved wilderness water right on the transfer of existing rights within the stream system or through a transbasin diversion. Transfers from above or within a wilderness area to below the wilderness would clearly not be affected since no less water would be allowed to flow through the wilderness. Only where transfers could result in the movement of rights from below to within or above the wilderness is there a potential effect. No such transfers are currently known to be proposed within any of the WSAs. Even if at some future date such a transfer were proposed, the effects would likely be minimal if any. Limitations that would be placed on such a transfer because of wilderness would almost certainly be no more significant than those that would be automatically imposed by other water rights more senior than any reserved wilderness water right. Even in the unlikely event that this were not the case, it is probable that flexibility could be provided to the water right holder while still assuring complete protection of the specific wilderness values associated with water flows through the WSA. Mitigations, flow augmentation measures, water right exchanges, purchases or donations, and other legal avenues could provide the means to accomplish this.

Since there are no expected effects on existing water rights and no proposals to transfer water rights are known or anticipated that would be significantly affected, this impact topic was dropped from further analysis for the WSAs in this environmental impact statement.

6. *Impacts on State and Private Inholdings and Split-Estate Lands* - The issue of how wilderness designation or nondesignation might affect state or private lands or non-Federal mineral inholdings was identified in the scoping process. This issue was dropped from further consideration because no activity is expected and the uses on these lands would not change as a result of designation or nondesignation. Also, BLM is required to allow access to inholdings in a designated wilderness. Designation or nondesignation would not impact non-Federal inholdings; therefore, inholdings are not an issue in this FEIS.

McIntyre Hills, Lower Grape Creek, Beaver Creek, and Upper Grape Creek are the only WSAs that have inholdings. The acreage and location of the inholdings for these WSAs are discussed in Chapter 3.

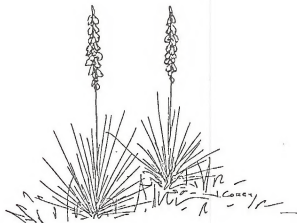
McIntyre Hills, Lower Grape Creek, and Upper Grape Creek WSAs have small areas of split-estate where the surface is Federal and the minerals are owned by the state. In all cases these are in low mineral potential areas and no exploration nor development is projected under any of the alternatives. Consequently the impacts on these areas are not addressed in this document and the split-estate land is not distinguished from the rest of the land in these WSAs. However, the locations are identified in Chapter 3. If any of these three WSAs are designated wilderness, BLM would attempt to acquire these subsurface minerals from the state.

## ANALYSIS OF IMPACTS

The last step of the planning amendment process was to analyze the environmental impacts of the proposed action and other alternatives. The *Canon City District Wilderness Planning Amendment Draft Environmental Impact Statement* was prepared and published in September 1982. This draft presented, for public review and comment, the results of the assessment of impacts for the proposed action and other alternatives for the various WSAs. Comments received have been used to prepare this FEIS. See Chapter 5 - Consultation for further discussion of these comments.

## REPORTING

The reporting phase consists of actually forwarding or reporting the suitable and unsuitable recommendations from the Secretary of the Interior to the President and from the President to the Congress.



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**CHAPTER TWO**  
**DESCRIPTION OF THE ALTERNATIVES**

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## CHAPTER 2 DESCRIPTION OF THE ALTERNATIVES

### INTRODUCTION

This chapter describes in detail the alternatives selected for analysis in this final environmental impact statement (FEIS). From two to four alternatives were examined for each of the seven wilderness study areas. With the exception of the no wilderness (no action) alternative for each WSA, all alternatives propose recommending to Congress some land as additions to the National Wilderness Preservation System (Table 2-1). Map 2-1 shows the proposed action for each WSA.

If designated by Congress, these additions to the National Wilderness Preservation System would be managed according to provisions of the 1964 *Wilderness Act*, the 1976 *Federal Land Policy and Management Act*, and the BLM final *Wilderness Management Policy* of September 24, 1981. These Acts and policy guidance direct the administering agency to be responsible for preserving the wilderness character of these WSAs. Section 4 of the 1964 *Wilderness Act*, which deals with use in wilderness areas, states that they shall be devoted to the public purposes of recreation, scenic, scientific, educational, conservation, and historical use.

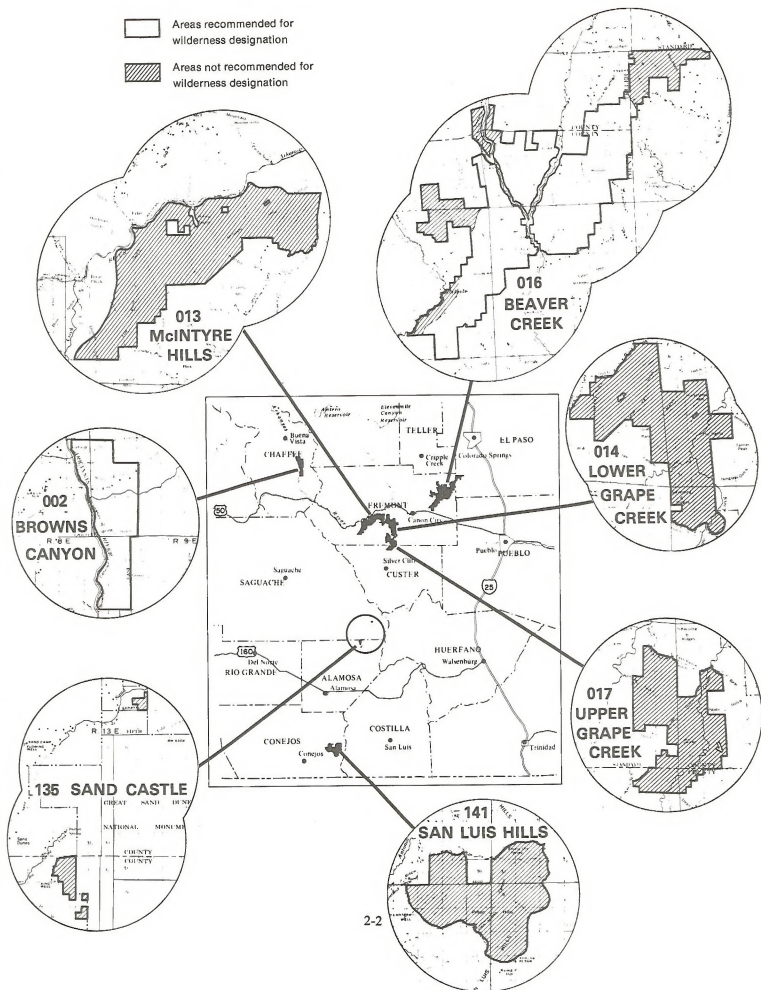
TABLE 2-1  
WILDERNESS ALTERNATIVES FOR THE CANON CITY DISTRICT

WSAs	Alternatives			
	A - All Wilderness Designation	B - No Wilderness Designation	C - Partial Wilderness Designation—I	D - Partial Wilderness Designation—II
Browns Canyon CO-050-002 (6,614 acres).	Proposed Action (6,614 acres).	(0 acres).	Not analyzed.	Not analyzed.
McIntyre Hills CO-050-013 (16,800 acres).	(16,800 acres).	Proposed Action (0 acres).	Not analyzed.	Not analyzed.
Lower Grape Creek CO-050-014 (11,220 acres).	(11,220 acres).	Proposed Action (0 acres).	(7,300 acres).	Not analyzed.
Beaver Creek CO-050-016 (26,150 acres).	(26,150 acres).	(0 acres).	Proposed Action (20,750 acres).	(17,000 acres).
Upper Grape Creek CO-050-017 (10,200 acres).	(10,200 acres).	Proposed Action (0 acres).	Not analyzed.	Not analyzed.
Sand Castle CO-050-135 (1,644 acres).	(1,644 acres).	Proposed Action (0 acres).	Not analyzed.	Not analyzed.
San Luis Hills CO-050-141 (10,240 acres).	(10,240 acres).	Proposed Action (0 acres).	(7,440 acres).	Not analyzed.

NOTE: Acreages shown in parentheses ( ) are those recommended for wilderness designation.

## Map 2-1 Proposed Action

-  Areas recommended for wilderness designation  
 Areas not recommended for wilderness designation



## DESCRIPTION OF THE ALTERNATIVES AND ASSUMPTIONS

Since the pattern of future actions within the WSAs cannot be predicted with certainty, assumptions were made to allow the analysis of impacts under the proposed action and alternatives. These assumptions are the basis of the impacts identified in this FEIS. They represent feasible patterns of activities that could occur under the alternatives analyzed.

1. In Bureau initiated actions, such as these wilderness studies, the "proposed action" and the agency "preferred alternative" are the same. For the sake of consistency and ease of understanding, the term "proposed action" will be used throughout the document.

2. If an area is not designated wilderness, it will be managed according to the existing land use plans.

3. If an area is designated wilderness, the BLM *Wilderness Management Policy* would provide management guidance.

4. Valid existing mining claims can be mined within a designated wilderness area as long as there is no unnecessary nor undue degradation. All existing claims on the date of designation would undergo a validity examination before any plan of operation would be approved.

5. If designated wilderness, no new mining claims could be staked or filed.

6. The mineral development scenario in Lower Grape Creek WSA has been developed using the best available data and provides the basis for the impacts identified in this chapter. It must be understood that the scenario and resultant impacts are used to provide a means of comparing the relative impacts of implementing any of the alternatives and should not be considered as a management proposal.

7. The BLM would be required to provide access for the reasonable use and enjoyment of patented claims and state mineral lands within wilderness areas.

8. If an area containing state mineral lands or privately-owned lands is designated wilderness, acquisition of those private or state interests may occur through purchase or exchange. Acquisition of nonpublic owned lands would occur only if the state or private owners concur with the acquisition, or if the acquisition is specifically authorized by Congress to be accomplished by eminent domain.

9. Mineral exploration and development in WSAs not designated wilderness would be in accordance with 43 CFR 3809, Surface Management of Public Lands under U.S. Mining Laws.

10. Range facilities would be maintained by customary methods, and new rangeland developments may be allowed

when site-specific environmental assessments show wilderness resources would not be impaired. Livestock grazing would be maintained at present levels unless adjusted for reasons prescribed through range management practices.

11. Wildlife habitat improvement projects would continue to be installed in designated areas if, through an environmental assessment, it is determined that the projects comply with the intent of wilderness legislation.

To provide the public and the decision maker with a convenient tool for comparing impacts and for defining issues and reaching conclusions, this chapter ends with Table 2-2 which compares (for each WSA) the impacts on resources that would result from each alternative.



### BROWNS CANYON (002)

#### PROPOSED ACTION—ALTERNATIVE A - ALL WILDERNESS DESIGNATION

Acres recommended for designation (Map 2-2)	6,614
Total acres in the wilderness study area (WSA)	6,614

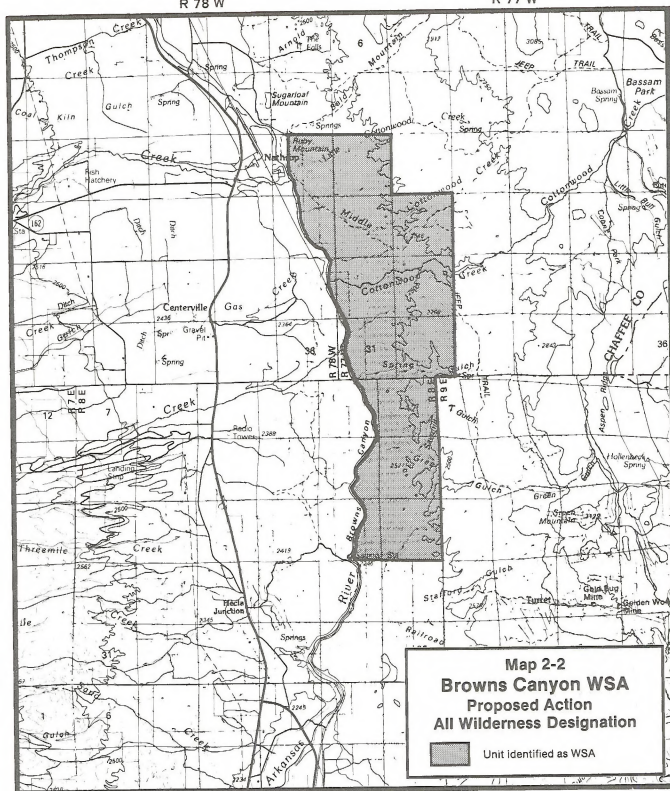
#### *Mineral Resource Management*

Under wilderness management, 6,614 acres within this WSA would be withdrawn from mineral entry, subject to all valid existing rights. Exploration for and the development of locatable minerals would be allowed only on those claims that prove valid existing rights. Currently there are nine claims totaling 180 acres in the WSA. These claims would be subject to the 43 CFR 3809 regulations regarding surface management and BLM *Wilderness Management Policy*.

Except for a small perlite deposit on the east side of Ruby Mountain, the entire WSA is considered low in mineral potential. It is not expected that this site would be developed, because of the small size of the perlite deposit, lack of nearby processing facilities, and since only one of the existing claims is near this deposit. None of the other existing claims are expected to prove valid; therefore, no further exploration nor development would occur.

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## BROWNS CANYON WSA

### *Timber Resource Management*

Under wilderness designation, timber resources would not be actively managed and no harvest would occur.

### *Wildlife Habitat Management*

Wildlife habitat under wilderness protection would be managed to provide for current numbers of 160 mule deer and 135 bighorn sheep.

Five planned spring projects would be constructed to prevent further deterioration of the natural spring site. These springs would be developed in the following locations: approximately one-half mile east of the Arkansas River in Green Gulch; near the eastern boundary of the WSA in Spring Gulch; approximately three-quarters of a mile from the eastern boundary of the WSA along Cottonwood Creek; just east of the Arkansas River approximately one-quarter mile north of Cottonwood Creek; and approximately one-quarter mile east of the river along Middle Cottonwood Creek. Helicopters would be used on a one-time basis to transport equipment and material to project sites, which would result in minimal surface disturbance to the WSA. No roads would be constructed since future maintenance would be done on foot.

### *Recreation Management*

The WSA would be managed to maintain the existing recreation uses of hiking, backpacking, and hunting in a wilderness setting. Back-country vehicle use would not occur.

Recreation use under wilderness management would total approximately 25 annual recreation days. The primary recreation uses would be hiking, backpacking, and hunting. Since the southern portion of the WSA is very steep and rugged, the majority of this use occurs north of Spring Gulch. There are no developed trails nor other recreation facilities presently in the WSA and none are planned.

## **ALTERNATIVE B - NO WILDERNESS DESIGNATION**

Acres recommended for designation	0
Total acres in wilderness study area (WSA)	6,614

### *Mineral Resource Management*

All 6,614 acres within this WSA would be open for exploration and development of the locatable mineral resources.

The entire WSA is considered low in mineral potential and no exploration nor development is expected. There is a small perlite deposit on the eastern side of Ruby Mountain;

however, because of the small size and lack of nearby processing facilities, it is not expected that this site would be developed. Currently there are nine mining claims (180 acres) in the WSA.

### *Timber Resource Management*

Intensive sustained-yield management would occur on the 3,910 acres of woodlands and 65 acres of productive forest land (PFL). Intensive management practices would consist of clearcutting, selective cutting, and two-stage shelterwood harvest. Timber would not be harvested in the remainder of the WSA.

The 100,682 cords of pinon-juniper firewood within the 3,910 operable acres of woodlands would be harvested on a sustained-yield basis north of Spring Gulch. Woodlands would be harvested either by clearcutting or selective cutting. Clearcutting would be done in even-aged stands. Uneven-aged stands would be selectively cut (trees over a certain diameter would be removed and trees less than a certain diameter would be left). Clearcuts generally range from 1 to 10 acres in size; the average area would be 3 to 4 acres and would be cut in an irregular pattern to be less visually obtrusive. Harvest of firewood is projected to take place once every 4 to 5 years and include a total of 70 to 100 acres each time.

Harvest of 1,976 Mbf of sawtimber (ponderosa pine and Douglas-fir) would occur in two locations south of Cottonwood Creek. The 65 operable acres of PFL would be harvested using the two-stage shelterwood method. During the first stage, 60 to 70 percent of the total original volume would be removed; during the second stage (approximately 10 to 20 years later), the residual growth would be harvested.

Mitigation measures are included in the two-stage shelterwood method, which allows some trees to remain standing to disseminate seeds for reforestation. This is more visually appealing than removing all the trees from the area at one time.

It is estimated that construction of up to 3.5 miles of primitive road would be necessary for firewood and sawtimber harvest and would be expected to result in up to 5 acres of surface disturbance.

Although the northern portion of the WSA has some steep terrain, logging roads would be constructed on the flat areas and would avoid side slopes with grades greater than 35 percent. These roads would be low standard (12 feet wide) and would utilize water bars, rolling dips, and culverts to minimize erosion.

The total 3.5 miles of proposed road would be closed to the public during the timber harvest project to avoid safety

## CHAPTER 2 DESCRIPTION OF THE ALTERNATIVES

problems with logging trucks and would be closed and revegetated following completion of the project.

### *Wildlife Habitat Management*

Management objectives would be to improve wildlife habitat and increase wildlife populations, which would occur principally through resource management actions such as firewood and sawtimber harvest.

As in the all wilderness alternative, five spring projects are proposed to protect the springs from deteriorating. They would be constructed in the following locations: approximately one-half mile east of the Arkansas River in Green Gulch; near the eastern boundary of the WSA in Spring Gulch; approximately three-quarters of a mile from the eastern boundary of the WSA along Cottonwood Creek; just east of the Arkansas River approximately one-quarter mile north of Cottonwood Creek; and approximately one-quarter mile east of the river along Middle Cottonwood Creek. Helicopters would be used on a one-time basis to transport materials and equipment to project sites, which would result in minimal surface disturbance to the WSA. No roads would be constructed since future maintenance would be done on foot.

### *Recreation Management*

The WSA would be managed to maintain the existing recreation uses of hiking, backpacking, and hunting in a predominantly primitive back-country setting.

Management would continue for the existing 25 annual recreation days of hiking, backpacking, and hunting. It is expected that about 12 annual recreation days would occur in some of the drainages and primitive areas south of Spring Gulch with the remaining 13 annual recreation days expected to occur north of Spring Gulch.

Back-country vehicle use would not be allowed in this WSA if it is not designated wilderness. There are no developed hiking trails and none are planned.

## MCINTYRE HILLS (013)

### PROPOSED ACTION—ALTERNATIVE B - NO WILDERNESS DESIGNATION

Acres recommended for designation (Map 2-3)	0
Total acres in the wilderness study area (WSA)	16,800

### *Mineral Resource Management*

All 16,800 acres within this WSA would be open for exploration and development of the locatable mineral resources.

The entire WSA is considered low in mineral potential and no exploration nor development is expected. Currently there are 25 mining claims in the WSA totaling approximately 500 acres.

### *Livestock Grazing Management*

The WSA would be managed to provide an additional 80 AUMs of forage for livestock use.

Thinning 1,120 acres of pinon and juniper is planned as a livestock grazing project. This thinning is included in the 1,190 operable acres planned for harvest as a timber resource project. As a result of this harvest, AUMs are expected to increase from 700 to 780 and the increase would be allocated to livestock.

### *Timber Resource Management*

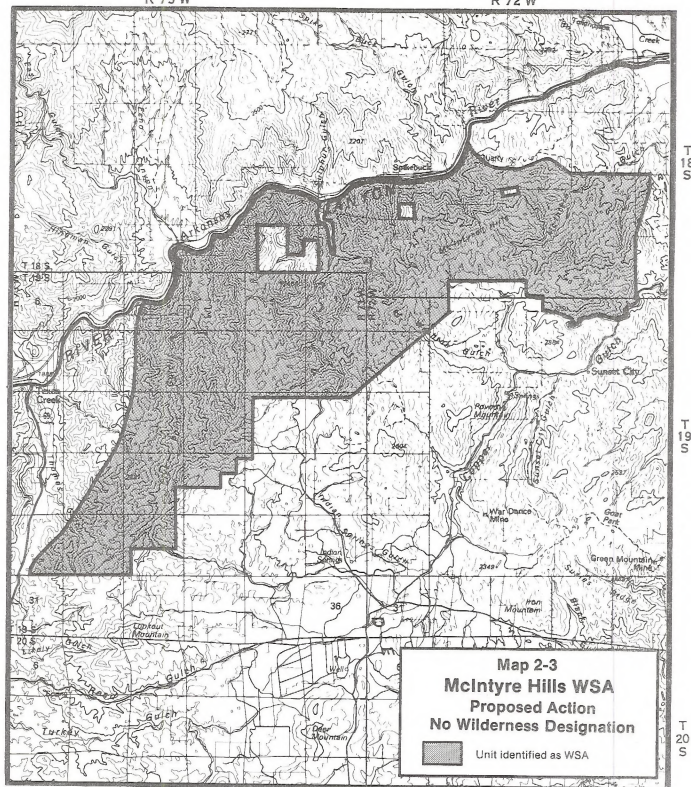
Intensive sustained-yield management would occur on the 1,190 acres of woodlands and 571 acres of productive forest land (PFL). Intensive management practices would consist of clearcutting, selective cutting, and two-stage shelterwood harvest. Timber would not be harvested in the remainder of the WSA.

The 35,105 cords of pinon-juniper firewood within the 1,190 operable acres of woodlands would be harvested on a sustained-yield basis along the southern WSA boundary between Five Points and McIntyre Gulch. Woodlands would be harvested either by clearcutting or selective cutting. Clearcutting would be done in even-aged stands. Uneven-aged stands would be selectively cut (trees over a certain diameter would be removed and trees less than a certain diameter would be left). Clearcuts generally range from 1 to 10 acres in size; the average area would be 3 to 4 acres and would usually be cut in an irregular pattern to be less visually obtrusive. Harvest of firewood is projected to take place once every 5 to 10 years and include a total of 70 to 100 acres each time.

Harvest of 6,977 Mbf of sawtimber (ponderosa pine and Douglas-fir) would occur along the southern WSA boundary west of Washtub Gulch. The 571 operable acres of PFL would be harvested using the two-stage shelterwood method. During the first stage, 60 to 70 percent of the total original volume would be removed; during the second stage (approximately 10 to 20 years later), the remaining commercial timber would be harvested.

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## CHAPTER 2 DESCRIPTION OF THE ALTERNATIVES

Mitigation measures are included in the two-stage shelterwood method, which allows some trees to remain standing to disseminate seeds for reforestation. This is more visually appealing than removing all the trees from the area at one time.

It is estimated that construction of up to 2 miles of primitive road would be necessary for timber harvest and would be expected to result in up to 3 acres of surface disturbance.

Logging roads would be constructed on the less rugged areas and would avoid side slopes with grades greater than 35 percent. These roads would be low standard (12 feet wide) and would utilize water bars, rolling dips, and culverts to minimize erosion. Access to the projects would be from the south to minimize road construction in the WSA.

The total 2 miles of proposed road would be closed to the public during the firewood and sawtimber harvest projects to avoid safety problems with logging trucks and would be closed and reclaimed following completion of the project.

### *Wildlife Habitat Management*

Management objectives would be to improve wildlife habitat and, therefore, increase mule deer, bighorn sheep, and turkey populations.

Although the exact location is unknown, it is expected that three water catchments would be constructed in the following locations: near the northern WSA boundary east of McIntyre Gulch; near the northern WSA boundary west of Sheep Basin; and near the northern WSA boundary east of Five Points Gulch. Catchments would improve distribution of mule deer and bighorn sheep. It is estimated that construction of a total of approximately 1 mile of primitive road on gently sloping terrain may be necessary for transporting material and equipment to these sites. These roads would be low standard (12 feet wide or less) and water bars, rolling dips, and culverts would be used to minimize erosion. These roads would not be open to the public; however, they would be used for maintenance of the catchments. This would result in about 1.5 acres of surface disturbance.

In addition, 100 acres of oakbrush would be burned to increase browse for an additional 15 mule deer. Although the exact location of this burn is not known, it is presumed that it would be located on relatively level to gently sloping terrain along the southern WSA boundary. Road construction would not be necessary.

### *Recreation Management*

The WSA would be managed for the recreation uses of hiking, backpacking, hunting, and back-country vehicle travel in a predominantly primitive back-country setting.

The WSA would be managed for the existing 105 annual recreation days. In addition the WSA would be managed to accommodate increases in hunter use projected as a result of wildlife habitat management actions described in this chapter under Wildlife Habitat Management.

Management would continue for the existing hiking and backpacking, with approximately 70 percent of this use occurring in Sheep Basin and Five Points Gulch. Hunter use would continue to be dispersed throughout the WSA.

Existing back-country vehicle use would continue in some of the drainages, such as Washtub Gulch along the southern WSA boundary, in the southern portion of Five Points Gulch, and the northern portion of Sheep Basin. There are no developed hiking trails nor other recreation facilities presently in the WSA and none are planned.

### **ALTERNATIVE A - ALL WILDERNESS DESIGNATION**

Acres recommended for designation	16,800
Total acres in wilderness study area (WSA)	16,800

### *Mineral Resource Management*

Under wilderness management, 16,800 acres within this WSA would be withdrawn from mineral entry, subject to all valid existing rights. Exploration for and the development of locatable minerals would be allowed only on those claims that prove valid existing rights. Currently there are 25 claims totaling 500 acres in the WSA. These claims would be subject to the 43 CFR 3809 surface management regulations and BLM *Wilderness Management Policy*. The entire WSA is considered low in mineral potential and no exploration nor development is expected.

### *Livestock Grazing Management*

The present level of 700 AUMs would be maintained.

Thinning of 1,120 acres of pinon and juniper identified in the no wilderness alternative would not occur. No other livestock grazing projects are expected.

### *Timber Resource Management*

Under wilderness designations, timber resources would not be actively managed and no harvest would occur.

### *Wildlife Habitat Management*

Wildlife habitat under wilderness protection would be managed to provide for current numbers of 400 mule deer, 50 bighorn sheep, and 100 turkey. Planned construction of three water catchments and a 100-acre oakbrush burn



## LOWER GRAPE CREEK

described in the no wilderness alternative to increase wildlife populations would not occur.

### *Recreation Management*

The WSA would be managed to maintain the existing recreation uses of hiking, backpacking, and hunting in a wilderness setting. Back-country vehicle use would not be permitted.

Recreation use under wilderness management would total 40 annual recreation days. The primary recreation uses would be hiking, backpacking, and hunting. Approximately 70 percent of the hiking and backpacking would continue to occur in Sheep Basin and Five Points Gulch. Hunter use would remain dispersed throughout the WSA. There are no developed trails nor other recreation facilities presently in the WSA and none are planned.

## LOWER GRAPE CREEK (014)

### PROPOSED ACTION—ALTERNATIVE B - NO WILDERNESS DESIGNATION

Acres recommended for designation (Map 2-4)	0
Total acres in the wilderness study area (WSA)	11,220

### *Mineral Resource Management*

All 11,220 acres within this WSA would be open for exploration and development of the locatable mineral resources.

Geochemical analysis has indicated a favorable zone of approximately 2,000 acres showing moderate potential for base and precious metals (copper, lead, silver), which trends northeast to southwest between Horseshoe Mountain and the Green Mountain Mine. There are 80 mining claims totaling approximately 1,600 acres within these 2,000 acres. Examination of previously explored sites in this favorable zone revealed the presence of marginally profitable ore (copper, lead, silver) at current metal prices and production costs.

The remaining 9,220 acres in the WSA administered by BLM are considered to have a low potential for mineral discovery. On this 9,220 acres, there are 76 mining claims totaling 1,520 acres.

Because of the favorable zone showing moderate potential for base and precious metals, some mineral exploration is expected. It is assumed this exploration and possible road construction would occur around the western side of Horseshoe Mountain since this is the primary area within the favorable zone where a large concentration of existing

claims is located. Since the terrain is rugged, most exploration work would probably consist of transporting small portable drilling rigs to core drill for mineral deposits. This type of exploration may take place on between 1 and 10 sites. Each exploration site would be generally less than one-quarter acre in size. It is possible that a total of 1.5 to 3 miles of road construction suitable for transportation of portable drill rigs to these sites would occur. This road construction could result in up to 4 acres of surface disturbance. These roads to the exploration sites would be used only by the claimants during exploration and then closed and revegetated.

Since the majority of claims within the 2,000-acre favorable zone are around the western side of Horseshoe Mountain, it is assumed there would be development of one mine in this same area resulting in production of silver and associated by-products of copper and lead. The most logical method of mining the area would be to drive an adit into the side of the mountain.

Based on similar developments in the local area outside the WSA, it is estimated that 20 acres of surface disturbance would be associated with developing a mine. This would include approximately 2 acres of disturbance from construction of approximately 1.5 miles of road from Marsh Gulch at the northern WSA boundary to the mine and 18 acres of disturbance associated with tailing piles, adit, loading areas, processing facility, and other buildings in the vicinity of the mine. This road would be closed to the public by the mine operator for safety reasons. The ore would probably be processed onsite to a concentrate. The tailings would be left onsite and the concentrate transported off site for further refinement.

Although much of the WSA consists of steep terrain, mining roads for mineral exploration and mine development would be constructed on the less rugged areas and would avoid side slopes with grades greater than 35 percent. These roads would not be wider than 12 feet and would utilize water bars, rolling dips, and culverts to minimize erosion. The existing way leading to Marsh Gulch would be used to reduce the amount of road construction.

### *Livestock Grazing Management*

The WSA would be managed to provide an additional 60 AUMs of forage for livestock use and distribute livestock more effectively.

Two spring developments would be constructed; one near the southern WSA boundary at the beginning of Goat Park Gulch and the second close to the western WSA boundary near the beginning of Sawmill Gulch. Both springs would improve livestock distribution by attracting cattle to areas where livestock water did not previously exist. Each project would involve less than one-quarter acre of surface

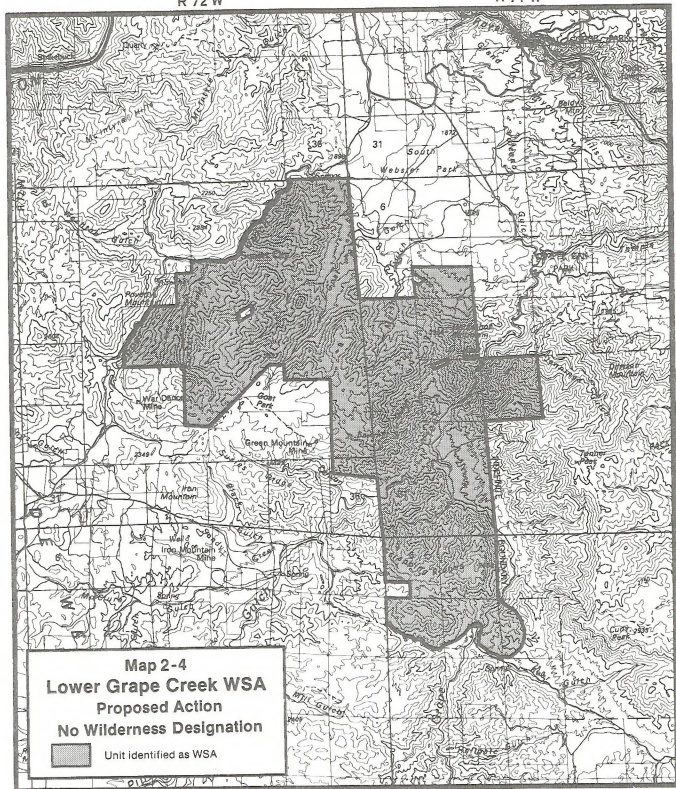
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## LOWER GRAPE CREEK WSA

disturbance and no road construction since they would probably be in accessible gulches near the WSA boundary. Vehicular travel would be allowed along an existing way by the rancher only as necessary to maintain these springs.

Thinning 1,160 acres of pinon and juniper is planned as a livestock grazing project. This thinning is included in the 1,910 operable acres that are planned for harvest as a timber resource project. As a result of this harvest, AUMs are expected to increase from 231 to 291 and the increase would be allocated to the rancher.

### *Timber Resource Management*

Intensive sustained-yield management would occur on the 1,910 operable acres of woodlands and 389 acres of productive forest land (PFL). Intensive management practices would consist of clearcutting and stocking control through selective cutting and two-stage shelterwood harvest. Timber would not be harvested on the remainder of the WSA.

The 43,930 cords of pinon-juniper firewood within the 1,910 operable acres of woodlands would be harvested on a sustained-yield basis in locations along the eastern WSA boundary south of Horseshoe Mountain; north of Horseshoe Mountain; along the northern WSA boundary near Marsh Gulch; south of Marsh Gulch along the western WSA boundary; and southwest of Upper Goat Park Gulch. Woodlands would be harvested either by clearcutting or selective cutting. Clearcutting would be done in even-aged stands. Uneven-aged stands would be selectively cut (trees over a certain diameter would be removed and trees less than a certain diameter would be left). Clearcuts generally range from 1 to 10 acres in size; the average area would be 3 to 4 acres and would usually be cut in an irregular pattern to be less visually obtrusive. Harvest of firewood is projected to take place once every 5 to 10 years and include a total of 70 to 100 acres each time.

Harvest of 8,558 Mbf of sawtimber (ponderosa pine and Douglas-fir) would occur in locations south of Marsh Gulch along the western WSA boundary and southwest of Upper Goat Park Gulch. The 389 operable acres of PFL would be harvested using the two-stage shelterwood method. During the first stage, 60 to 70 percent of the total original volume would be removed; during the second stage (approximately 10 to 20 years later), the residual growth would be harvested.

Mitigation measures are included in the two-stage shelterwood method, which allows some trees to remain standing to disseminate seeds for reforestation. This is more visually appealing than removing all the trees from the area at one time.

It is estimated that construction of up to 4.5 miles of primitive road would be necessary for firewood and sawtimber harvest

and would be expected to result in up to 7 acres of surface disturbance.

Although much of the WSA consists of steep and rugged terrain, logging roads would be constructed on the less rugged areas and would avoid side slopes with grades greater than 35 percent. These roads would be low standard (12 feet wide) and would utilize water bars, rolling dips, and culverts to minimize erosion.

The total 4.5 miles of proposed road would be closed to the public during the firewood and sawtimber harvest project to avoid safety problems with logging trucks and would be closed and revegetated following completion of the project.

### *Wildlife Habitat Management*

#### *Terrestrial*

Management objectives would be to improve wildlife habitat and, therefore, increase mule deer, bighorn sheep, and turkey populations.

Three water catchments would be constructed in the following locations: approximately 1 mile east of Scrapping Ridges; approximately one-half mile south of the junction of Pine Gulch and Grape Creek; and approximately 1 mile southeast of Horseshoe Mountain. Catchments would improve distribution of mule deer, bighorn sheep, and turkey. It is estimated that construction of a total of approximately 3 miles of primitive road on gently rolling terrain may be necessary for transporting material and equipment to the sites. These roads would be low standard (12 feet wide or less) and water bars, rolling dips, and culverts would be used to minimize erosion. The existing way in Pine Gulch would be used to reduce the amount of road construction. This would result in about 4.5 acres of surface disturbance.

A planned 500-acre pinon-juniper clearcut to increase browse for an additional 50 mule deer and 5 bighorn sheep would occur approximately one-third mile east of Sunset City Gulch. This clearcut would consist of several 10- to 20-acre patches and would be cut in an irregular pattern, which is less visually obtrusive. It is estimated that construction of approximately 1 mile of primitive road would be necessary and would be expected to result in 1.5 acres of surface disturbance. Although much of the WSA is steep, this road would be constructed on gently rolling terrain and it would be low standard (12 feet wide or less) with water bars, rolling dips, and culverts to minimize erosion. The existing ways leading to Sunset City Gulch would be used to reduce the amount of road construction.

The total of up to 4 miles of road, which would be constructed for these projects, would be closed to the public. This would avoid safety problems with logging trucks and other vehicles used in the development of the projects. The road to the

## CHAPTER 2 DESCRIPTION OF THE ALTERNATIVES

500-acre pinon-juniper project would also be closed and revegetated following the project. The roads to the catchments would be closed to the public; however, they would be used for maintenance of these catchments.

### *Aquatic*

The management objective would be to improve riparian and aquatic habitat so that portions of Grape Creek within the WSA would be capable of supporting 60 pounds of game fish per acre.

Gabions would be constructed to increase game fish from approximately 10 to about 60 pounds per acre and decrease nongame fish from approximately 90 to about 40 pounds per acre. This aquatic habitat improvement would increase pool/riffle ratio, which would attract game fish. Habitat attracting nongame fish would be decreased. These projects would be located approximately 200 yards north of the junction of Bear Gulch and Grape Creek. No new roads would be constructed.

### *Recreation Management*

The WSA would be managed for the recreation uses of hiking, backpacking, hunting, fishing, and back-country vehicle travel in a predominantly primitive back-country setting.

The WSA would be managed for the existing 350 annual recreation days. In addition the WSA would be managed to accommodate increases in hunting and fishing use projected as a result of wildlife habitat management actions described in this chapter.

Management would continue for the existing hiking, backpacking, and fishing. All the fishing and approximately 90 percent of the hiking and backpacking would occur along the Grape Creek corridor. Hunting would continue to be dispersed throughout the WSA.

Existing back-country vehicle use would continue on a number of dead-end spurs around the western perimeter of the WSA. There are no developed hiking trails nor other recreation facilities presently in the WSA and none are planned. A trail for back-country vehicle use was considered along Grape Creek, but it is no longer considered appropriate because it would be inconsistent with the predominantly primitive back-country setting.

### **ALTERNATIVE A - ALL WILDERNESS DESIGNATION**

Acres recommended for designation	11,220
Total acres in the wilderness study area (WSA)	11,220

### *Mineral Resource Management*

Under wilderness management, 11,220 acres within this WSA would be withdrawn from mineral entry, subject to all valid existing rights. Exploration for and the development of locatable minerals would be allowed only on those claims that prove valid existing rights. Currently there are 156 claims totaling 3,120 acres in the WSA. These claims would be subject to the 43 CFR 3809 regulations and BLM *Wilderness Management Policy*.

As a result of existing mining claims on the western side of Horseshoe Mountain, it is expected that one mine would be developed and would be located in this area, as in the no wilderness alternative. It is estimated that 20 acres of surface disturbance would be associated with the development of this mine. It is presumed that only those claims resulting in the projected mine would prove valid; therefore, no further exploration would occur.

### *Livestock Grazing Management*

The WSA would be managed to distribute livestock more effectively and maintain the present level of 231 AUMs.

As in the no wilderness alternative, construction of two spring developments would occur; one near the southern WSA boundary at the beginning of Goat Park Gulch and the second near the western WSA boundary close to the beginning of Sawmill Gulch. Both springs would improve livestock distribution by attracting cattle to areas where livestock water did not previously exist. Each project would involve less than one-quarter acre of surface disturbance and no road construction since they would be in accessible gulches near the WSA boundary.

Thinning of 1,160 acres of pinon and juniper identified in the no wilderness alternative would not occur.

### *Timber Resource Management*

Under wilderness designation, timber resources would not be actively managed and no harvest would occur.

### *Wildlife Habitat Management*

#### *Terrestrial*

Wildlife habitat under wilderness protection would be managed to provide for current numbers of 280 mule deer, 28 bighorn sheep, and 100 turkey. Planned construction of three water catchments and harvest of 500 acres of pinon and juniper as described in the no wilderness alternative would not occur. Road construction for implementation of projects would be unnecessary.



## LOWER GRAPE CREEK WSA

### *Aquatic*

Management objectives would be to protect the existing aquatic habitat and maintain the present levels of approximately 10 pounds/acre of game fish and approximately 90 pounds/acre of nongame fish in Grape Creek.

Gabions identified in the no wilderness alternative would not be constructed.

### *Recreation Management*

This WSA would be managed to maintain the existing recreation uses of hiking, backpacking, fishing, and hunting in a wilderness setting. Back-country vehicle use would not be permitted.

Recreation use under wilderness management would total 240 annual recreation days. The primary recreation uses would be hiking, backpacking, fishing, and hunting. About 90 percent of the recreational use would continue to occur along Grape Creek except for hunting, which would be dispersed throughout the WSA. There are no developed trails nor other recreation facilities presently in the WSA and none are planned.

### ALTERNATIVE C - PARTIAL WILDERNESS DESIGNATION

Acres recommended for designation (Map 2-5) 7,300

Acres not recommended for designation 3,920

Total acres in the wilderness study area (WSA) 11,220

The two boundary adjustments in this alternative omit the cumulative impacts of past mining operations and eliminate much of the resource conflict with minerals.

### *Mineral Resource Management*

The 7,300 acres recommended for wilderness designation would be withdrawn from mineral entry, subject to all valid existing rights. Exploration for and the development of locatable minerals would be allowed only on those claims

that prove valid existing rights. Currently there are 90 mining claims totaling approximately 1,800 acres within this portion of the WSA. These claims would be subject to the 43 CFR 3809 regulations and BLM *Wilderness Management Policy*.

It is assumed that none of the claims in this portion of the WSA would prove valid; therefore, no further exploration nor development would occur. Of the 7,300 acres recommended for designation, the remaining 5,500 acres not covered by mining claims would be closed to exploration and development actions.

The 3,920 acres not recommended for wilderness designation would remain open for exploration and development of the locatable mineral resources. Currently there are 66 claims totaling 1,320 acres within this portion of the WSA. There are approximately 800 acres with moderate potential for discovery and development of base and precious metals (copper, lead, silver).

As in the no wilderness alternative, it is assumed that some mineral exploration and possible road construction would occur around the western side of Horseshoe Mountain since this is the primary area within the favorable zone where a large concentration of existing claims is located. Since the terrain is rugged, most exploration work would probably consist of transporting small portable drilling rigs to core drill for mineral deposits. This type of exploration may take place on between 1 and 6 sites. Each drill site is generally less than one-quarter acre in size. It is expected that a total of 1 to 2 miles of road construction suitable for transportation of portable drill rigs to these sites would occur. This construction could result in up to 3 additional acres of surface disturbance. This road would be used only by the claimant during exploration and then closed and revegetated. It is assumed that the same mine discussed in the all and no wilderness alternatives would also be subsequently developed in this area. It is estimated that 20 acres of surface disturbance would be associated with developing a mine.

Mitigation measures for the road construction for access to the mineral exploration sites and mine site are the same as those described in the no wilderness alternative.

The following chart summarizes mineral resources for this alternative.

Acres	Mineral Potential			Mining Claims	Mines Expected
	Low	Moderate	High		
7,300 (recommended suitable)	6,100 acres	1,200 acres	0	90 claims (approximately 1,800 acres)	None
3,920 (recommended unsuitable)	3,120 acres	800 acres	0	66 claims (approximately 1,320 acres)	1
11,220 acres (entire WSA)	9,220 acres	2,000 acres	0	156 claims (approximately 3,120 acres)	1

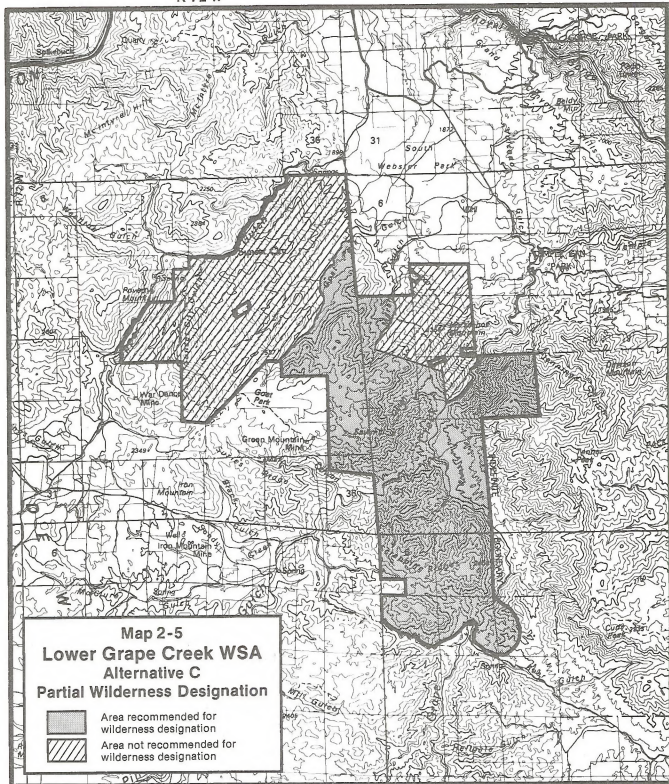
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## LOWER GRAPE CREEK WSA

### *Livestock Grazing Management*

The WSA would be managed to improve livestock distribution on the 7,300 acres recommended for wilderness and increase AUMs on the 3,920 acres not recommended.

On the portion recommended for wilderness, the spring developments identified in the all and no wilderness alternatives would also be constructed under this alternative. Construction of the developments would be near the southern WSA boundary at the beginning of Goat Park Gulch and close to the western WSA boundary near the beginning of Sawmill Gulch. These are expected to improve livestock distribution by attracting cattle to areas where livestock water previously did not exist.

On the portion not recommended, a 500-acre pinon-juniper thinning project (compared to a total of 1,160 project acres in the no wilderness alternative) would be harvested as a timber resource project. This project would provide more forage; therefore, an increase of 33 allocated AUMs is expected in this portion of the WSA.

### *Timber Resource Management*

Harvest of 1,410 operable acres of pinon and juniper and 286 operable acres of ponderosa pine and Douglas-fir would not occur on the 7,300 acres recommended for wilderness.

On the 3,920 acres not recommended for wilderness designation, 500 of the total 1,910 operable acres of woodlands would be intensively managed. Harvest of 11,500 cords of pinon and juniper on the 500 acres of woodlands, compared to 43,930 cords in the no wilderness alternative, would occur in locations north of Horseshoe Mountain; along the northern WSA boundary near Marsh Gulch; and southwest of Upper Goat Park Gulch. Harvest of this firewood would be done as described in the no wilderness alternative.

Also on the portion not recommended for wilderness, harvest of 2,935 Mbf of ponderosa pine and Douglas-fir on 103 of the 389 operable acres, compared to 8,558 Mbf in the no wilderness alternative, would occur in locations southwest of Upper Goat Park Gulch. This harvest would be done using the two-stage shelterwood method, which includes mitigation measures, as described in the no wilderness alternative.

In the portion not recommended for wilderness, road construction would take place as described in the no wilderness alternative, but only 1.5 miles of road would be constructed compared to 4.5 miles in the no wilderness alternative. This road would be closed to the public during the firewood and sawtimber harvest project to avoid safety problems with logging trucks and would be closed and revegetated following completion of the project.

### *Wildlife Habitat Management*

#### *Terrestrial*

Management objectives on the 7,300 acres recommended for wilderness would be to protect existing habitat and maintain present populations of approximately 182 mule deer, 18 bighorn sheep, and 65 turkey. Construction of the proposed water catchments to improve wildlife distribution would not occur.

Management objectives for the 3,920 acres not recommended for wilderness designation would be to improve wildlife habitat and, therefore, increase mule deer and bighorn sheep populations. As in the no wilderness alternative, a 500-acre pinon-juniper clearcut would occur one-third mile east of Sunset City Gulch.

#### *Aquatic*

Management objectives in this alternative would be the same as in the all wilderness alternative since all the aquatic habitat is in the 7,300 acres recommended for wilderness designation. This objective would be to protect the existing aquatic habitat and maintain the existing levels of approximately 10 pounds/acre of game fish and approximately 90 pounds/acre of nongame fish.

Gabions planned for increased pool/riffle ratio in the no wilderness alternative would not be constructed.

### *Recreation Management*

The 7,300 acres recommended for wilderness designation would be managed to maintain existing recreation uses of hiking, backpacking, hunting, and fishing. These uses would occur in a wilderness setting and no back-country vehicle use would occur.

Recreation use in the portion recommended for wilderness would be managed for approximately 232 annual recreation days. Approximately 95 percent of the hiking and backpacking and all of the fishing would continue to occur along the Grape Creek corridor, which would all be designated wilderness. Hunting would continue to be predominantly dispersed throughout the WSA and motorized back-country vehicle travel would not occur. There are no developed trails nor other recreation facilities presently in this portion of the WSA and none are planned.

The 3,920 acres not recommended for wilderness designation would be managed for the existing recreation uses of hiking, backpacking, hunting, and back-country vehicle travel in a predominantly primitive back-country setting.

The portion not recommended for wilderness would continue to be managed for the existing use of 33 annual recreation days, which is not expected to change as a result of recreation

## CHAPTER 2 DESCRIPTION OF THE ALTERNATIVES

management actions. Hiking and backpacking would continue at existing levels. This portion of the WSA would also be managed to accommodate increases in hunting use, which are projected as a result of wildlife habitat management actions described in this chapter. Back-country vehicle use would be limited to existing ways and trails. Therefore, this use would continue on a number of dead-end spurs around the western perimeter of the WSA since these areas would not be designated wilderness under this alternative.

There are no developed trails nor other recreation facilities presently in this portion of the WSA and none are planned.

### BEAVER CREEK (016)

#### PROPOSED ACTION—ALTERNATIVE C - PARTIAL WILDERNESS DESIGNATION—I

Acres recommended for designation (Map 2-6)	20,750
Acres not recommended for designation	<u>5,400</u>
Total acres in the wilderness study area (WSA)	26,150

This alternative makes boundary adjustments, which omit three narrow extensions to facilitate administration of the WSA and eliminate a resource conflict with vehicle oriented recreation along the Phantom Canyon road.

#### *Mineral Resource Management*

The 20,750 acres recommended for wilderness designation would be withdrawn from mineral entry, subject to all valid existing rights. Exploration for and the development of locatable minerals would be allowed only on those claims that prove valid existing rights. These claims would be subject to the 43 CFR 3809 regulations and BLM *Wilderness Management Policy*. Since there are currently no mining claims in this portion of the WSA and the mineral potential is low, neither exploration nor development is expected.

The 5,400 acres not recommended for wilderness designation would remain open for exploration and development of the locatable mineral resources. This portion of the WSA has low mineral potential and currently has four mining claims totaling approximately 80 acres. No exploration nor development is expected.

#### *Timber Resource Management*

Harvest of 493 operable acres of pinon and juniper and 57 operable acres of ponderosa pine and Douglas-fir would not occur on the 20,750 acres recommended for wilderness.

On the 5,400 acres not recommended for wilderness, there are no operable acres of woodlands. However, harvest of 3,560 Mbf of ponderosa pine and Douglas-fir on 120 operable acres would occur west of East Eightmile Creek and north of Little Turkey Creek along the extreme northeastern WSA boundary. This compares to the 5,142 Mbf that would be harvested in the no wilderness alternative. This 120 acres would be harvested using the two-stage shelterwood method. During the first stage, 60 to 70 percent of the total original volume would be removed; during the second stage (approximately 10 to 20 years later), the remaining commercial timber would be harvested.

Mitigation measures are included in the two-stage shelterwood method, which allows some trees to remain standing to disseminate seeds for reforestation. This is more visually appealing than removing all the trees from the area at one time.

In the portion not recommended, it is estimated that approximately one-half mile of primitive road construction would be necessary for timber harvest. This would be expected to result in less than 1 acre of surface disturbance. These roads would be closed to the public during the sawtimber harvest project to avoid safety problems with logging trucks and would be closed and revegetated following completion of the project.

#### *Wildlife Habitat Management*

Wildlife habitat would be managed to provide for current numbers of 650 mule deer, 50 bighorn sheep, and 225 turkey. No wildlife improvement projects are planned in the portion of the WSA recommended nor the portion not recommended for wilderness designation.

#### *Recreation Management*

The 20,750 acres recommended for wilderness designation would be managed to maintain existing recreation uses of hiking, backpacking, hunting, and fishing. These uses would occur in a wilderness setting and no back-country vehicle use would occur.

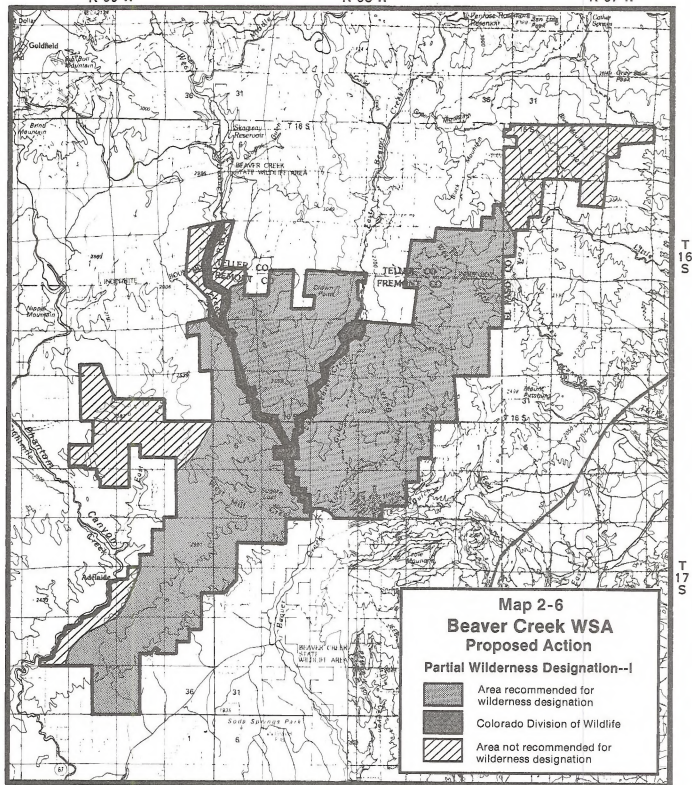
Recreation use in the portion recommended for wilderness would total approximately 800 annual recreation days. Approximately 95 percent of the hiking and backpacking would continue to occur in Trail Gulch, West Mill Creek, and along Beaver Creek, which would all be designated wilderness. All the fishing use would occur in Beaver Creek. The annual hunting use would continue to be predominantly dispersed throughout the WSA. One existing trail along Beaver Creek and another trail between Beaver Creek and Trail Gulch would be maintained without mechanized equipment. No other trails nor recreation facilities are planned.



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## CHAPTER 2 DESCRIPTION OF THE ALTERNATIVES

The 5,400 acres not recommended for wilderness designation would be managed for the existing recreation uses of hiking, car camping, hunting, and back-country vehicle travel in a predominantly primitive back-country setting. Almost all of this use would continue to occur near Phantom Canyon road along the western boundary where heavy recreational traffic occurs. Back-country vehicle use would occur only on existing ways and trails, which only exist adjacent to the Phantom Canyon road.

The portion not recommended for wilderness would continue to be managed for the existing use of 1,200 annual recreation days, which is not expected to change as a result of recreation management actions. Hiking, car camping, and back-country vehicle use would continue at existing levels. There are no developed trails nor other recreation facilities presently in this portion of the WSA and none are planned.

### ALTERNATIVE A - ALL WILDERNESS DESIGNATION

Acres recommended for designation (Map 2-7)	26,150
Total acres in the wilderness study area (WSA)	26,150

#### *Mineral Resource Management*

Under wilderness management, 26,150 acres within this WSA would be withdrawn from mineral entry, subject to all valid existing rights. Exploration for and the development of locatable minerals would be allowed only on those claims that prove valid existing rights. Currently there are four claims in the WSA totaling approximately 80 acres. These claims would be subject to the 43 CFR 3809 surface management regulations and BLM *Wilderness Management Policy*. The entire WSA is considered low in mineral potential and no exploration nor development is expected.

#### *Timber Resource Management*

Under wilderness designation, timber resources would not be actively managed and no harvest would occur.

#### *Wildlife Habitat Management*

Wildlife habitat under wilderness protection would be managed to provide for current numbers of 650 mule deer, 50 bighorn sheep, and 225 turkey. No wildlife improvement projects are planned.

#### *Recreation Resource Management*

This WSA would be managed to maintain the existing recreation uses of hiking, backpacking, hunting, and fishing in a wilderness setting. Current back-country vehicle use

and car camping east of the Phantom Canyon road would not be permitted.

Recreation use under wilderness management would total 800 annual recreation days. The primary recreation uses would be hiking, backpacking, fishing, and hunting. Approximately 90 percent of the hiking and backpacking would continue to occur in Trail Gulch, West Mill Creek, and along Beaver Creek. All the fishing would occur in Beaver Creek, and hunting would be dispersed throughout the WSA. There is one trail along Beaver Creek and another trail between Beaver Creek and Trail Gulch; however, no other trails nor recreation facilities are planned.

### ALTERNATIVE B - NO WILDERNESS DESIGNATION

Acres recommended for designation	0
Total acres in the wilderness study area (WSA)	26,150

#### *Mineral Resource Management*

All 26,150 acres within this WSA would be open for exploration and development of the locatable mineral resources.

The entire WSA is considered low in mineral potential and no exploration nor development is expected. Currently there are four mining claims in the WSA totaling approximately 80 acres.

#### *Timber Resource Management*

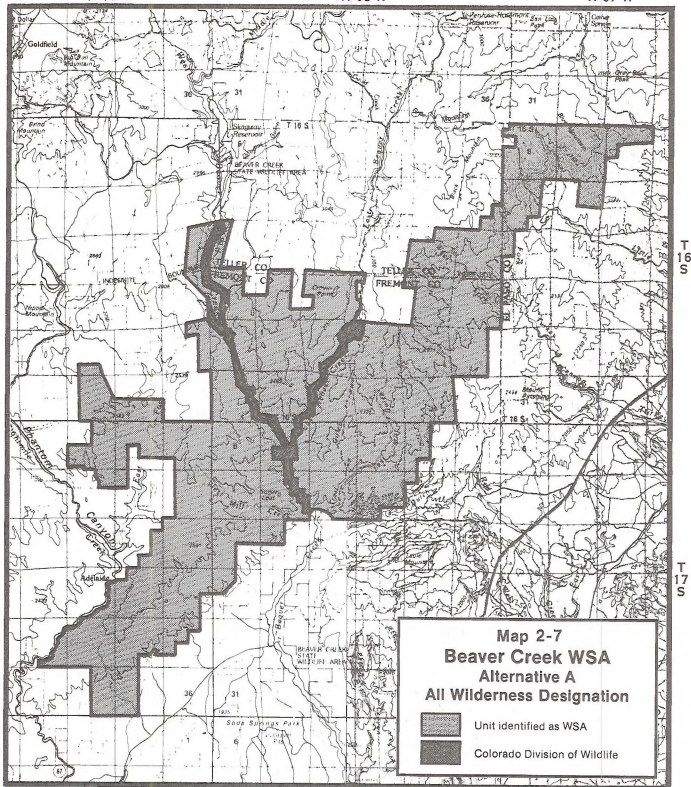
Intensive sustained-yield management would occur on the 493 operable acres of woodlands and 177 operable acres of productive forest land (PFL). Intensive management practices would consist of clearcutting, selective cutting, and two-stage shelterwood harvest. Timber would not be harvested on the remainder of the WSA.

The 12,882 cords of pinon-juniper firewood within the 493 operable acres of woodlands would be harvested on a sustained-yield basis in the southwestern part of the WSA along the southern boundary. Woodlands would be harvested either by clearcutting or selective cutting. Clearcutting would be done in even-aged stands. Uneven-aged stands would be selectively cut (trees over a certain diameter would be removed and trees less than a certain diameter would be left). Clearcuts generally range from 1 to 10 acres in size; the average area would be 3 to 4 acres and would usually be cut in an irregular pattern to be less visually obtrusive. Harvest of firewood is projected to take place once every 5 to 10 years and include a total of 70 to 100 acres each time.

R 69 W

R 68 W

R 67 W



## CHAPTER 2 DESCRIPTION OF THE ALTERNATIVES

Harvest of 5,142 Mbf of sawtimber (ponderosa pine and Douglas-fir) would occur in locations west of East Eightmile Creek, between East Eightmile Creek and West Beaver Creek, and north of Little Turkey Creek. The 177 operable acres of PFL would be harvested using the two-stage shelterwood method, which includes mitigation measures as described in Alternative C - Partial Wilderness—I.

It is estimated that construction of up to 2 miles of primitive road would be necessary for firewood and sawtimber harvest and would be expected to result in up to 3 acres of surface disturbance.

Logging roads would be constructed on the less rugged areas and would avoid side slopes with grades greater than 35 percent. These roads would be low standard (12 feet wide) and would utilize water bars, rolling dips, and culverts to minimize erosion.

The total 2 miles of proposed road would be closed to the public during the firewood and sawtimber harvest to avoid safety problems with logging trucks and would be closed and reclaimed following completion of the project.

### *Wildlife Habitat Management*

Management objectives would be to protect present wildlife habitat and maintain present populations of 650 mule deer, 50 bighorn sheep, and 225 turkey. No wildlife projects are planned in this WSA.

### *Recreation Management*

The WSA would be managed for the recreation uses of hiking, backpacking, car camping, hunting, fishing, and back-country vehicle travel in a predominantly primitive back-country setting.

The WSA would be managed for the existing 2,000 annual recreation user days. Approximately 90 percent of the hiking and backpacking would continue to occur in Trail Gulch, West Mill Creek, and along Beaver Creek. Hunting would continue to be dispersed throughout the WSA; however, all the fishing use would occur in Beaver Creek.

Existing back-country vehicle use would continue primarily in connection with car camping near the western boundary along Phantom Canyon. One existing trail along Beaver Creek and another trail between Beaver Creek and Trail Gulch would be maintained without mechanized equipment. No other trails nor recreation facilities are planned.

## ALTERNATIVE D - PARTIAL WILDERNESS DESIGNATION—II

Acres recommended for designation (Map 2-8)	17,000
Acres not recommended for designation	<u>9,150</u>
Total acres in the wilderness study area (WSA)	26,150

This alternative makes boundary adjustments, which omit three narrow extensions to facilitate administration of the WSA. Additionally, 4,000 acres south of Holbert drainage and parallel to Phantom Canyon would be eliminated. This would eliminate a conflict with vehicle oriented recreation along the Phantom Canyon Road.

### *Mineral Resource Management*

The 17,000 acres recommended for wilderness designation would be withdrawn from mineral entry, subject to all valid existing rights. Exploration for and the development of locatable minerals would be allowed only on those claims that prove valid existing rights. These claims would be subject to the 43 CFR 3809 regulations and BLM *Wilderness Management Policy*. Since there are currently no mining claims in this portion of the WSA and the mineral potential is low, neither exploration nor development is expected.

The 9,150 acres not recommended for wilderness designation would remain open for exploration and development of the locatable mineral resources. This portion of the WSA has low mineral potential and currently has four mining claims totaling approximately 80 acres. No exploration nor development is expected.

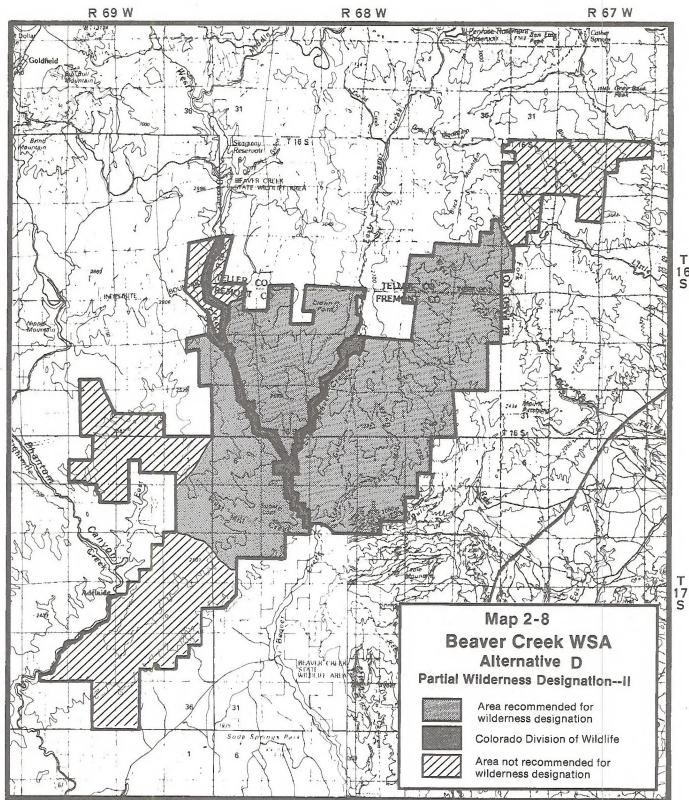
### *Timber Resource Management*

Harvest of 57 operable acres of ponderosa pine and Douglas-fir would not occur on the 17,000 acres recommended for wilderness.

The 9,150 acres not recommended for wilderness contain all of the 493 operable acres of woodlands within the WSA. Harvesting of 12,882 cords of pinon and juniper would occur on a sustained-yield basis along the southern WSA boundary near the extreme southwestern part of the WSA.

Woodlands would be harvested either by clearcutting or selective cutting. Clearcutting would be done in even-aged stands. Uneven-aged stands would be selectively cut (trees over a certain diameter would be removed and trees less than a certain diameter would be left). Clearcuts generally range from 1 to 10 acres in size; the average area would be 3 to 4 acres and would usually be cut in an irregular pattern to be less visually obtrusive. Harvest of firewood is projected to take place once every 5 to 10 years and include a total of 70 to 100 acres each time.





## CHAPTER 2 DESCRIPTION OF THE ALTERNATIVES

Also on the 9,150 acres not recommended for wilderness, harvest of 3,560 Mbf of sawtimber (ponderosa pine and Douglas-fir) on 120 operable acres of PFL would occur in locations west of East Eightmile Creek and north of Little Turkey Creek along the extreme northeastern WSA boundary. This compares to 5,142 Mbf that would be harvested in the no wilderness alternative. Harvest would occur using the two-stage shelterwood method, which includes mitigation measures as described in Alternative C - Partial Wilderness Designation —I.

It is estimated that construction of up to 2 miles of primitive road would be necessary for firewood and sawtimber harvest and would be expected to result in up to 3 acres of surface disturbance.

Although much of the WSA consists of steep and rugged terrain, logging roads would be constructed on the less rugged areas and would avoid side slopes with grades greater than 35 percent. These roads would be low standard (12 feet wide) and would utilize water bars, rolling dips, and culverts to minimize erosion.

The total 2 miles of proposed road would be closed to the public during the firewood and sawtimber harvest project to avoid safety problems with logging trucks and would be closed and revegetated following completion of the project.

### *Wildlife Habitat Management*

Wildlife habitat would be managed to provide for current numbers of 650 mule deer, 50 bighorn sheep, and 225 turkey. No wildlife habitat improvement projects are planned in the portion of the WSA recommended nor the portion not recommended for wilderness designation.

### *Recreation Management*

The 17,000 acres recommended for wilderness designation would be to maintain the existing recreation uses of hiking, backpacking, hunting, and fishing. These uses would occur in a wilderness setting and no back-country vehicle use would occur.

Recreation use in the portion recommended for wilderness would total approximately 800 annual recreation days. Approximately 95 percent of the hiking and backpacking would continue to occur in Trail Gulch, West Mill Creek, and along Beaver Creek. Of these 800 annual recreation days, approximately 100 annual hunter days would continue to be dispersed throughout this portion of the WSA, and all the fishing would occur in Beaver Creek. Back-country vehicle travel would not occur. One existing trail along Beaver Creek and another trail between Beaver Creek and Trail Gulch would be maintained without mechanized

equipment. No other trails nor recreation facilities are planned.

The 9,150 acres not recommended for wilderness designation would be managed for the existing recreation uses of hiking, car camping, hunting, and back-country vehicle travel in a predominantly primitive back-country setting.

Almost all of this use would continue to occur near Phantom Canyon road along the western boundary where heavy recreational traffic occurs. Back-country vehicle use would occur only on existing ways and trails adjacent to the Phantom Canyon road.

The portion not recommended for wilderness would continue to be managed for the existing use of 1,200 annual recreation days, which is not expected to change as a result of recreation management actions. Hiking and car camping would continue at existing levels. There are no developed trails nor other recreation facilities presently in this portion of the WSA and none are planned.

## UPPER GRAPE CREEK (017)

### PROPOSED ACTION—ALTERNATIVE B - NO WILDERNESS DESIGNATION

Acres recommended for designation (Map 2-9)	0
Total acres in the wilderness study area (WSA)	10,200

### *Mineral Resource Management*

All 10,200 acres within this WSA would be open for exploration and development of the locatable mineral resources.

The entire WSA is considered low in mineral potential and no exploration nor development is expected. Currently there are 31 mining claims in the WSA totaling approximately 620 acres.

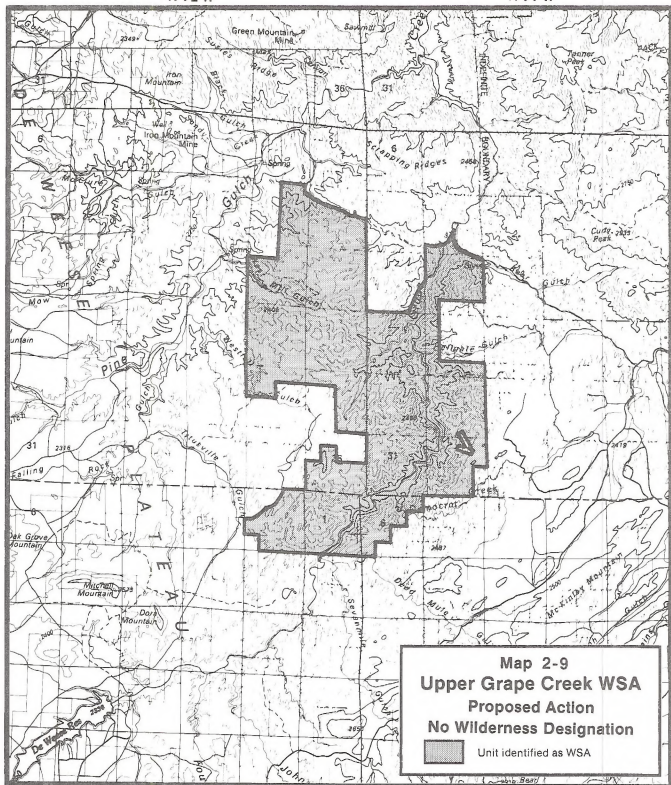
### *Livestock Grazing Management*

The WSA would be managed to provide an additional 60 AUMs of forage for livestock use.

Thinning 900 acres of pinon and juniper is planned as a livestock grazing project. This thinning is included in the 922 operable acres that are planned for harvest as a timber resource project. As a result of this harvest, AUMs are expected to increase from 800 to 860 with the increase being allocated to livestock.

R 72 W

R 71 W



T 19 S

T 20 S

T 21 S

## CHAPTER 2 DESCRIPTION OF THE ALTERNATIVES

### *Timber Resource Management*

Intensive sustained-yield management would occur on the 922 operable acres of woodlands and 1,003 acres of productive forest land (PFL). Intensive management practices would consist of clearcutting, selective cutting, and two-stage shelterwood harvest. Timber would not be harvested on the remainder of the WSA.

The 26,840 cords of pinon-juniper firewood within the 922 operable acres of woodlands would be harvested on a sustained-yield basis in locations between Pierce Gulch and Western Gulch. Woodlands would be harvested either by clearcutting or selective cutting. Clearcutting would be done in even-aged stands. Uneven-aged stands would be selectively cut (trees over a certain diameter would be removed and trees less than a certain diameter would be left). Clearcuts generally range from 1 to 10 acres in size; the average area would be 3 to 4 acres and would usually be cut in an irregular pattern to be less visually obtrusive. Harvest of firewood is projected to take place once every 5 to 10 years and include a total of 70 to 100 acres each time.

Harvest of 28,886 Mbf of sawtimber (ponderosa pine and Douglas-fir) would occur in locations between Pierce Gulch and Western Gulch. The 1,003 operable acres of PFL would be harvested using the two-stage shelterwood method. During the first stage, 60 to 70 percent of the total original volume would be removed; during the second stage (approximately 10 to 20 years later), the remaining commercial timber would be harvested.

Mitigation measures are included in the two-stage shelterwood method, which allows some trees to remain standing to disseminate seeds for reforestation. This is more visually appealing than removing all the trees from the area at one time.

It is estimated that construction of up to 5 miles of primitive road would be necessary for firewood and sawtimber harvest and would be expected to result in up to 7.5 acres of surface disturbance.

Logging roads would be constructed on the less rugged areas and would avoid side slopes with grades greater than 35 percent. These roads would be low standard (12 feet wide) and would utilize water bars, rolling dips, and culverts to minimize erosion.

The total 5 miles of proposed road would be closed to the public during the firewood and sawtimber harvest project to avoid safety problems with logging trucks and would be closed and reclaimed following completion of the project.

### *Wildlife Habitat Management*

#### *Terrestrial*

Management objectives would be to improve wildlife habitat and, therefore, increase mule deer and turkey populations.

Although the exact locations are unknown, it is expected that three water catchments would be constructed in the following general locations: south of East Pierce Gulch, west of West Mill Gulch, and south of Hellgate Gulch. Catchments to be used only by wildlife would improve distribution of mule deer and turkey. It is estimated that construction of up to a total of 1.5 miles of primitive road on gently rolling terrain would be necessary for transporting material and equipment to the sites. These roads would be low standard (12 feet wide or less) and water bars, rolling dips, and culverts would be used to minimize erosion. This would result in about 2.5 acres of surface disturbance.

#### *Aquatic*

The management objective would be to improve riparian and aquatic habitat so that portions of Grape Creek within the WSA would be capable of supporting 60 pounds of game fish per acre.

Gabions would be constructed to increase game fish from approximately 10 to about 60 pounds per acre and decrease nongame fish from approximately 90 to about 40 pounds per acre. This aquatic habitat improvement would increase pool/riffle ratio, which would attract game fish. Habitat attracting nongame fish would be decreased. These projects would be located approximately 600 yards south of the junction of Bear Gulch and Grape Creek. No new roads would be constructed.

### *Recreation Management*

The WSA would be managed for the recreation uses of hiking, backpacking, hunting, fishing, and back-country vehicle travel in a predominantly primitive back-country setting.

The WSA would be managed for the existing 275 annual recreation days. In addition the WSA would be managed to accommodate increases in hunting and fishing use projected as a result of wildlife habitat management actions described in this chapter.

Management would continue for the existing hiking, backpacking, and fishing. All the fishing and approximately 90 percent of the hiking and backpacking would occur along the Grape Creek corridor. Hunting would continue to be dispersed throughout the WSA.

Existing back-country vehicle use would continue in some of the drainages around the southwestern perimeter of the WSA. There are no developed hiking trails or other



## SAND CASTLE WSA

recreation facilities presently in the WSA and none are planned. A trail for back-country vehicle use was considered along Grape Creek, but it is no longer considered appropriate because it would be inconsistent with the predominantly primitive back-country setting.

### ALTERNATIVE A - ALL WILDERNESS DESIGNATION

Acres recommended for designation	10,200
Total acres in the wilderness study area (WSA)	10,200

#### *Mineral Resource Management*

Under wilderness management, 10,200 acres within this WSA would be withdrawn from mineral entry, subject to all valid existing rights. Exploration for and the development of locatable minerals would be allowed only on those claims that prove valid existing rights. Currently there are 31 claims in the WSA totaling 620 acres. These claims would be subject to the 43 CFR 3809 regulations and BLM *Wilderness Management Policy*. The entire WSA is considered low in mineral potential and no exploration nor development is expected.

#### *Livestock Grazing Management*

The WSA would be managed to distribute livestock more evenly and maintain the present level of 800 AUMs.

Thinning of 900 acres of pinon and juniper identified in the no wilderness alternative would not occur. No other livestock grazing projects are expected.

#### *Timber Resource Management*

Under wilderness designation, timber resources would not be actively managed and no harvest would occur.

#### *Wildlife Habitat Management*

##### *Terrestrial*

Wildlife habitat under wilderness protection would be managed to provide for current numbers of 270 mule deer and 75 turkey. Planned construction of three water catchments as described in the no wilderness alternative to increase wildlife populations would not occur and the associated road construction would be unnecessary.

##### *Aquatic*

Management objectives would be to protect the existing aquatic habitat and maintain the present levels of approximately 10 pounds/acre of game fish and approximately 90 pounds/acre of nongame fish in Grape Creek.

Gabions identified in the no wilderness alternative would not be constructed.

#### *Recreation Management*

This WSA would be managed to maintain the existing recreation uses of hiking, backpacking, fishing, and hunting in a wilderness setting. Back-country vehicle use would not be permitted.

Recreation use under wilderness management would total 240 annual recreation days. The primary recreation uses would be hiking, backpacking, fishing, and hunting. All of the fishing and about 90 percent of the recreational use would continue to occur along Grape Creek except for hunting, which would be dispersed throughout the WSA. There are no developed trails nor other recreation facilities presently in the WSA and none are planned.

## SAND CASTLE (135)

### PROPOSED ACTION—ALTERNATIVE B - NO WILDERNESS DESIGNATION

Acres recommended for designation (Map 2-10)	0
Total acres in the wilderness study area (WSA)	1,644

#### *Mineral Resource Management*

All 1,644 acres within this WSA would be open for exploration and development of the locatable mineral resources.

The entire WSA is considered low in mineral potential and no exploration nor development is expected. Currently there are no mining claims in the WSA.

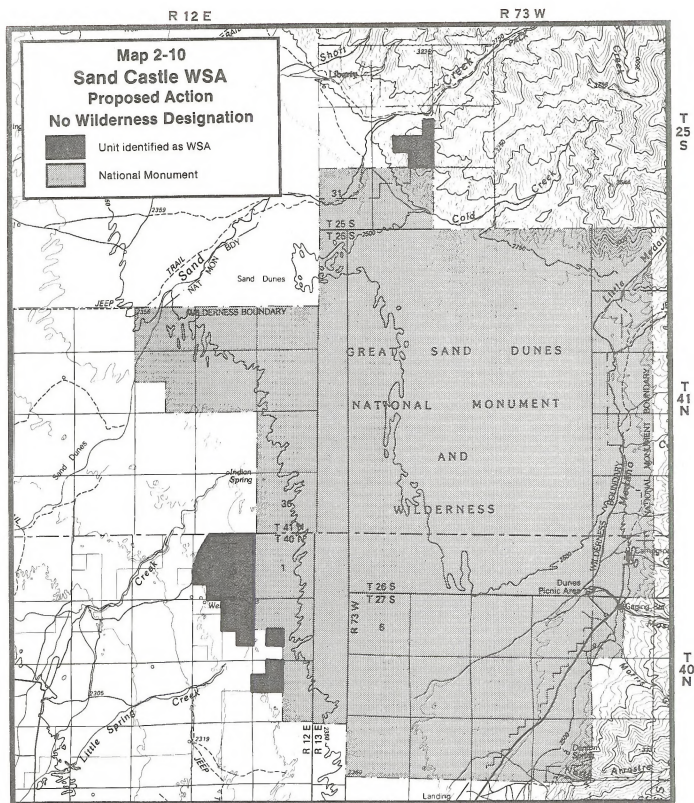
#### *Wildlife Habitat Management*

This WSA has little value for wildlife and no projects are planned.

#### *Recreation Management*

The WSA would be managed for the recreation uses of hiking and back-country vehicle travel in a predominantly primitive back-country setting.

The WSA would be managed for the existing 75 annual recreation days of hiking and back-country vehicle use. These uses would be dispersed throughout the three parcels adjacent to the western boundary of the Great Sand Dunes Wilderness area.



## SAN LUIS HILLS WSA

There are no developed trails nor recreation facilities in this WSA and none are planned.

### ALTERNATIVE A - ALL WILDERNESS DESIGNATION

Acres recommended for designation	1,644
Total acres in the wilderness study area (WSA)	1,644

#### *Mineral Resource Management*

Under wilderness management, 1,644 acres within this WSA would be withdrawn from mineral entry, subject to all valid existing rights. Exploration for and the development of locatable minerals would be allowed only on those claims that prove valid existing rights. These claims would be subject to the 43 CFR 3809 regulations and BLM *Wilderness Management Policy*. Currently there are no claims in the WSA. The entire WSA is considered low in mineral potential and no exploration nor development is expected.

#### *Wildlife Habitat Management*

This WSA has little value for wildlife and no projects are planned.

#### *Recreation Management*

This WSA would be managed for the existing recreation use of hiking, which would occur in a wilderness setting. Back-country vehicle use would not be permitted.

Recreation use under wilderness management would total 5 annual recreation days of hiking. This use would be dispersed throughout the three parcels adjacent to the western boundary of the Great Sand Dunes Wilderness area.

There are no developed trails nor recreation facilities in the WSA and none are planned.

## SAN LUIS HILLS (141)

### PROPOSED ACTION—ALTERNATIVE B - NO WILDERNESS DESIGNATION

Acres recommended for designation (Map 2-11)	0
Total acres in the wilderness study area (WSA)	10,240

#### *Mineral Resource Management*

All 10,240 acres within this WSA would be open for exploration and development of the locatable mineral resources.

The entire WSA is considered low in mineral potential and no exploration nor development is expected. Currently there are 67 mining claims in the WSA totaling approximately 1,340 acres.

#### *Wildlife Habitat Management*

Management objectives would be to protect present wildlife habitat and maintain present populations of 150 mule deer and 85 antelope.

No wildlife projects are planned in this WSA.

#### *Recreation Management*

The WSA would be managed for the recreation uses of hiking, backpacking, hunting, and back-country vehicle travel in a predominantly primitive back-country setting. The WSA would be managed for the existing 350 annual recreation user days.

Management would continue for the existing hiking and backpacking, with approximately 75 percent of this use occurring in John James Canyon and the higher elevations of the WSA. Hunting would continue to be dispersed throughout the WSA.

Existing back-country vehicle use totaling 165 annual recreation days would continue along existing ways and trails in John James Canyon, along the western WSA boundary, and in the northeastern portion of the WSA. There are no developed hiking trails nor other recreation facilities presently in the WSA and none are planned.

### ALTERNATIVE A - ALL WILDERNESS DESIGNATION

Acres recommended for designation	10,240
Total acres in the wilderness study area (WSA)	10,240


#### *Mineral Resource Management*

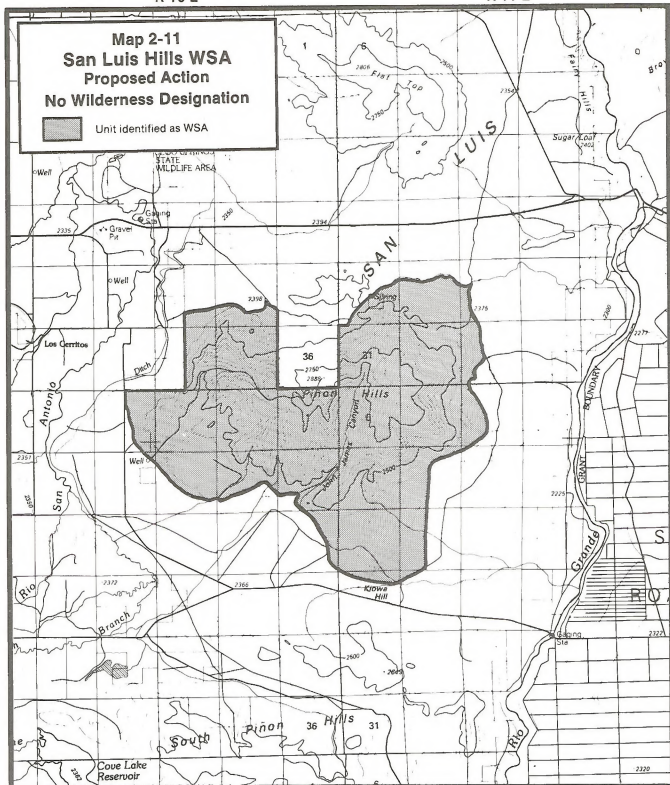
Under wilderness management, 10,240 acres within this WSA would be withdrawn from mineral entry, subject to all valid existing rights. Exploration for and the development of locatable minerals would be allowed only on those claims that prove valid existing rights. Currently there are 67 claims in the WSA totaling 1,340 acres. These claims would be subject to the 43 CFR 3809 regulations and BLM *Wilderness Management Policy*. The entire WSA is considered low in mineral potential and no exploration nor development is expected.

R 10 E

R 11 E

**Map 2-11**  
**San Luis Hills WSA**  
**Proposed Action**  
**No Wilderness Designation**

 Unit identified as WSA



T 34 N

T 33 N



1 0 1 2 3 MILES



## SAN LUIS HILLS WSA

### *Wildlife Habitat Management*

Wildlife habitat under wilderness designation would be managed to provide for current numbers of 150 mule deer and 85 antelope. No wildlife improvement projects are planned.

### *Recreation Management*

The WSA would be managed for the existing recreation uses of hiking, backpacking, and hunting in a wilderness setting. Back-country vehicle use would not be permitted.

Recreation use under wilderness management would total 160 annual recreation days. Approximately 75 percent of the hiking and backpacking would continue to occur in John James Canyon and the higher elevations of the WSA. Hunting would continue to be dispersed throughout the WSA. There are no developed trails nor other recreation facilities presently in the WSA and none are planned.

### ALTERNATIVE C - PARTIAL WILDERNESS DESIGNATION

Acres recommended for designation (Map 2-12)	7,440
Acres not recommended for designation	<u>2,800</u>
Total acres in the wilderness study area (WSA)	10,240

This alternative makes two boundary changes that would facilitate administration and also eliminate a portion of the WSA where public comment has indicated an interest in minerals.

### *Mineral Resource Management*

The 7,440 acres recommended for wilderness designation would be withdrawn from mineral entry, subject to all valid existing rights. Exploration for and the development of locatable minerals would be allowed only on those claims that prove valid existing rights. This portion of the WSA currently has nine mining claims totaling 180 acres. These claims would be subject to the 43 CFR 3809 regulations and BLM *Wilderness Management Policy*. Since the mineral potential is low, neither exploration nor development is expected.

The 2,800 acres not recommended for wilderness designation would remain open for exploration and development of the locatable mineral resources. Currently there are 58 mining claims totaling approximately 1,160 acres. Although interest has been shown by the public in this portion of the WSA, it is considered to have low mineral potential and no exploration nor development is expected.

### *Wildlife Habitat Management*

Wildlife habitat would be managed to provide for current numbers of 150 mule deer and 85 antelope. No wildlife habitat improvement projects are planned in the portion of the WSA recommended nor the portion not recommended for wilderness designation.

### *Recreation Management*

The 7,440 acres recommended for wilderness designation would be managed to maintain existing recreation uses of hiking, backpacking, and hunting. These uses would occur in a wilderness setting and no back-country vehicle use would occur.

Recreation use in the portion recommended for wilderness would total approximately 120 annual recreation days. The 30 annual recreation days of hiking and backpacking would continue to occur in John James Canyon and the higher elevations of the WSA. The 90 annual hunter days would continue to be dispersed throughout this portion of the WSA and back-country vehicle travel would not occur. There are no developed trails nor other recreational facilities presently in this portion of the WSA and none are planned.

The 2,800 acres not recommended for wilderness designation would be managed for the existing recreation uses of hiking, backpacking, camping, hunting, and back-country vehicle travel in a predominantly primitive back-country setting.

The portion not recommended for wilderness would continue to be managed for the existing use of approximately 75 annual recreation days, which is not expected to change as a result of recreation management actions. Hiking, camping, and backpacking would continue at existing levels. This portion of the WSA would also be managed for existing hunting use. Back-country vehicle use would be limited to existing ways and trails. Therefore, this use is expected to continue primarily in the northeastern portion of the WSA, which is not recommended. There are no developed trails nor other recreation facilities presently in the WSA and none are planned.

## COMPARISON OF IMPACTS

The following table (Table 2-2) compares the impacts of each resource by alternative for each wilderness study area.

R 10 E

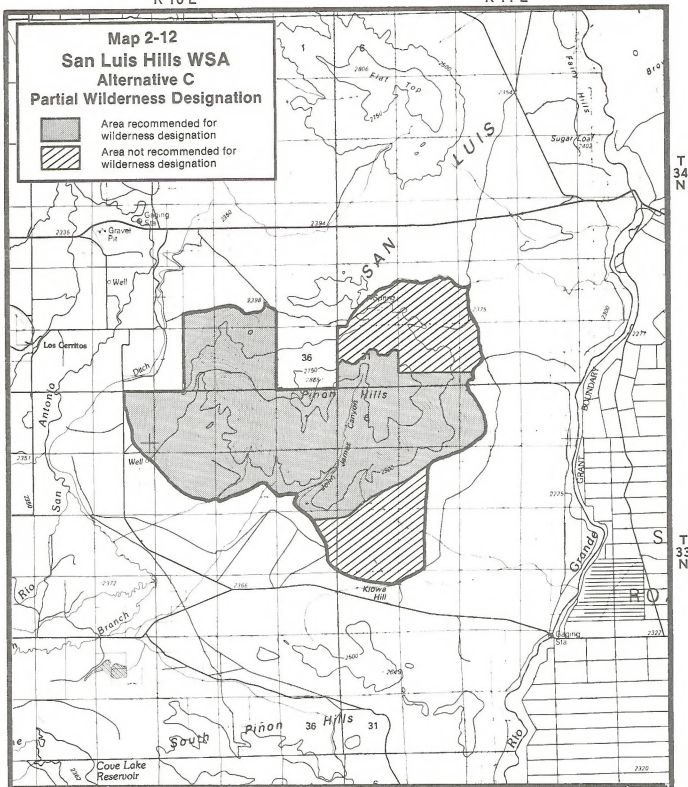
R 11 E

**Map 2-12**  
**San Luis Hills WSA**  
**Alternative C**  
**Partial Wilderness Designation**



Area recommended for  
wilderness designation

Area not recommended for  
wilderness designation



T 34 N

T 33 N



1 0 1 2 3 MILES

TABLE 2-2  
COMPARISON OF IMPACTS  
BROWNS CANYON WSA (002)

RESOURCE	PROPOSED ACTION	
	Alternative A - All Wilderness	Alternative B - No Wilderness
Wilderness Values	Wilderness values would be preserved on the entire WSA and given long-term protection.	Of the 6,614 acres not recommended for designation, wilderness values would be lost for the long term on approximately 4,000 acres and for the short term on an additional 200 acres. Although long-term protection would not be provided under this alternative, the remaining 2,414 acres would probably remain undisturbed in the foreseeable future and retain their wilderness values.
Locatable Mineral Exploration and Development	The entire 6,614 acres would be withdrawn from mineral entry and exploration with the exception of up to approximately 180 acres dependent on the validity of nine existing mining claims. There would be no significant impacts because of low development potential for all minerals.	The entire WSA would remain open to mineral entry; however, exploration or development is not expected. There would be no significant impacts because of low development potential for all minerals.
2-31 Timber Production	Wilderness designation would preclude harvest of 100,682 cords of firewood and 1,976 Mbf of sawtimber. This represents about 2 percent of the firewood and substantially less than 1 percent of the total sawtimber in the RGRA and nearby national forest land.	About 100,682 cords of firewood and 1,976 Mbf of sawtimber in this WSA would be produced. This represents about 2 percent of the firewood and substantially less than 1 percent of the sawtimber in the RGRA and nearby national forest land.
Wildlife Habitat and Population	Wildlife habitat would be protected and current populations of approximately 160 mule deer and 135 bighorn sheep would be unchanged.	Wildlife populations would increase by 20 mule deer and 5 bighorn sheep. This would be a 13 percent increase of mule deer in the WSA and substantially less than 1 percent in the RGRA. Bighorn sheep would increase by 4 percent in the WSA and 2 percent in the RGRA.
Recreation Use	The existing 25 annual recreation days would be maintained and would occur in a wilderness setting.	The existing 25 annual recreation days would be maintained in a predominantly primitive back-country setting. About 12 annual recreation days would shift to the portion of the WSA south of Spring Gulch.

TABLE 2-2  
COMPARISON OF IMPACTS  
McINTYRE HILLS WSA (013)

RESOURCE	PROPOSED ACTION	
	Alternative B - No Wilderness	Alternative A - All Wilderness
Wilderness Values	Of the 16,800 acres not recommended for designation, wilderness values would be lost for the long term on approximately 1,800 acres and for the short term on an additional 900 acres. Although long-term protection would not be provided under this alternative, the remaining 14,100 acres would probably remain undisturbed in the foreseeable future and retain their wilderness values.	Wilderness values would be preserved on the entire WSA and given long-term protection.
Locatable Mineral Exploration and Development	The entire WSA would remain open to mineral entry; however, exploration or development is not expected. There would be no significant impacts because of the low development potential for all minerals.	The entire 16,800 acres would be withdrawn from mineral entry and exploration with the exception of up to approximately 500 acres dependent on the validity of 25 existing mining claims. There would be no significant impacts because of the low development potential for all minerals.
Forage Production and Livestock Management	Range improvement projects would result in an additional 80 allocated AUMs, which is an 11 percent increase.	The current 700 AUMs would be maintained.
Timber Production	About 35,105 cords of firewood and 6,977 Mbf of sawtimber in this WSA would be produced. This represents about 1 percent of the firewood and substantially less than 1 percent of the sawtimber in the RGRA and nearby national forest land.	Wilderness designation would preclude harvest of 35,105 cords of firewood and 6,977 Mbf of sawtimber. This represents about 1 percent of the firewood and substantially less than 1 percent of the sawtimber in the RGRA and nearby national forest land.

## Continuation - McIntyre Hills

RESOURCE	PROPOSED ACTION	
	Alternative B - No Wilderness	Alternative A - All Wilderness
Wildlife Habitat and Population	Wildlife habitat would improve and populations would increase by 90 mule deer, 15 bighorn sheep, and 25 turkey. This would be a 23 percent increase of mule deer in the WSA and 1 percent in the RGRA. Bighorn sheep would increase by 30 percent in the WSA and 5 percent in the RGRA and turkey would increase by 25 percent in the WSA and 2 percent in the RGRA.	Wildlife habitat would be protected and current populations of approximately 400 mule deer, 50 bighorn sheep, and 100 turkey would be unchanged.
Recreation Use	An additional annual 10 recreation days, which is a 10 percent increase, would be expected. All recreation use would occur in a predominantly primitive back-country setting.	Elimination of back-country vehicle use would result in a decrease of 65 annual recreation days, which is a reduction of 62 percent of existing use. All recreation use would occur in a wilderness setting.

TABLE 2-2  
COMPARISON OF IMPACTS  
LOWER GRAPE CREEK WSA (014)

RESOURCE	PROPOSED ACTION		
	Alternative B - No Wilderness	Alternative A - All Wilderness	Alternative C - Partial
Wilderness Values	Of the 11,220 acres not recommended for designation, wilderness values would be lost for the long term on approximately 2,800 acres and the short term on an additional 2,000 acres. Although long-term protection would not be provided under this alternative, the remaining 6,420 acres would probably remain undisturbed in the foreseeable future and retain their wilderness values.	Of the 11,220 acres recommended for designation, wilderness values would be preserved on 10,200 acres and given long-term protection. Wilderness values are projected to be lost for the long term on approximately 20 acres and the short term on an additional 1,000 acres.	Of the total 11,220 acres in this WSA, 7,300 acres would be designated wilderness and given long-term protection. Wilderness values are expected to be lost for the long term on approximately 1,200 acres and for the short term on an additional 1,500 acres. Although no long-term protection would be provided, wilderness values are expected to remain undisturbed on an additional 1,220 acres in the portion recommended unsuitable.
Locatable Mineral Exploration and Development	The entire WSA would remain open to mineral entry. Production of an unknown amount of silver and the associated by-products of copper and lead is projected from one small mine on the western side of Horseshoe Mountain.	The entire 11,220 acres in the WSA would be withdrawn from mineral entry and exploration with the exception of up to approximately 3,120 acres dependent on the validity of 156 existing mining claims. Production of an unknown amount of silver and the associated by-products of copper and lead is projected from one small mine on the western side of Horseshoe Mountain.	The 7,300 acres recommended for wilderness designation would be withdrawn from mineral entry subject to proven valid existing rights. Exploration and development could continue on the remaining 3,920 acres of land not recommended for wilderness designation. Production of an unknown amount of silver and the associated by-products of copper and lead is projected from the same small mine on the western side of Horseshoe Mountain, as in the no wilderness and all wilderness alternatives.
Forage Production and Livestock Management	Range improvement projects would result in an additional 60 allocated AUMs, which is a 26 percent increase. Also livestock distribution would be expected to improve.	The current 231 AUMs would be maintained and livestock distribution would improve.	Range improvement projects would result in an additional 33 allocated AUMs, which is a 14 percent increase, and livestock distribution would improve.

## Continuation - Lower Grape Creek

RESOURCE	PROPOSED ACTION		
	Alternative B - No Wilderness	Alternative A - All Wilderness	Alternative C - Partial
Timber Production	About 51,930 cords of firewood and 8,558 Mbf of sawtimber in this WSA would be produced. This represents about 1 percent of the firewood and substantially less than 1 percent of the sawtimber in the RGRA and nearby national forest land.	Wilderness designation would preclude harvest of 51,930 cords of firewood and 8,558 Mbf of sawtimber. This represents about 1 percent of the firewood and substantially less than 1 percent of the sawtimber in the RGRA and nearby national forest land.	About 19,500 cords of the total 51,930 cords of firewood in the WSA and 2,935 Mbf of the total 8,558 Mbf of sawtimber would be produced. This represents substantially less than 1 percent of the firewood and sawtimber in the RGRA and nearby national forest land.
Wildlife Habitat and Population			
Terrestrial	Wildlife habitat and species distribution would improve and populations would increase by 120 mule deer, 10 bighorn sheep, and 40 turkey. This would be a 43 percent increase of mule deer in the WSA and 2 percent in the RGRA. Bighorn sheep would increase by 36 percent in the WSA and 3 percent in the RGRA and turkey would increase by 40 percent in the WSA and 3 percent in the RGRA.	Wildlife habitat would be protected and current populations of approximately 280 mule deer, 28 bighorn sheep, and 100 turkey would be unchanged.	Wildlife habitat would be protected on 7,300 acres recommended for wilderness and would be improved on portions of the remaining 3,920 acres not recommended. Increases in wildlife populations of 105 mule deer and 5 bighorn sheep would occur. This would be a 38 percent increase of mule deer in the WSA and 1 percent in the RGRA. Bighorn sheep would increase by 18 percent in the WSA and 2 percent in the RGRA.
Aquatic	Existing riparian habitat along Grape Creek would improve and game fish in Grape Creek would increase by 500 percent or 50 pounds per acre and nongame fish would decrease by 56 percent or 50 pounds per acre.	Existing riparian habitat would be protected and current game fish populations in Grape Creek of approximately 10 pounds per acre and nongame fish populations of approximately 90 pounds per acre would be maintained.	Existing riparian habitat would be protected and current game fish populations of approximately 10 pounds per acre and nongame fish populations of approximately 90 pounds per acre in Grape Creek would be maintained.
Recreation Use	An additional annual 35 recreation days, which is a 10 percent increase, is expected. All recreation use would occur in a predominantly primitive back-country setting.	Elimination of back-country vehicle use would result in a decrease of 110 annual recreation days, which is a reduction of 31 percent. All recreation use would occur in a wilderness setting.	Elimination of back-country vehicle use, in the portion recommended, would result in a decrease of 80 annual recreation days, which is a reduction of 23 percent from existing use. Recreation use would occur in a wilderness setting on the 7,300 acres recommended for wilderness designation and in a predominantly primitive back-country setting on the remaining 3,920 acres not recommended.



TABLE 2-2  
COMPARISON OF IMPACTS  
BEAVER CREEK WSA (016)

RESOURCE	PROPOSED ACTION Alternative C - Partial Wilderness-I	Alternative A All Wilderness	Alternative B No Wilderness	Alternative D - Partial Wilderness-II
Wilderness Values	Of the total 26,150 acres in this WSA, 20,750 acres would be designated wilderness and given long-term protection. Wilderness values are expected to be lost for the long term on approximately 120 acres and for the short term on an additional 200 acres. Although no long-term protection would be provided, wilderness values are expected to remain undisturbed on an additional 5,080 acres in the portion recommended nonsuitable.	Wilderness values would be preserved on the entire WSA and given long-term protection.	Of the 26,150 acres not recommended for designation, wilderness values would be lost for the long term on approximately 670 acres and the short term on an additional 400 acres. Although long-term protection would not be provided under this alternative, the remaining 25,080 acres would probably remain undisturbed in the foreseeable future and retain their wilderness values.	Of the total 26,150 acres in this WSA, 17,000 acres would be designated wilderness and given long-term protection. Wilderness values are expected to be lost for the long term on 610 acres and for the short term on an additional 350 acres. Although no long-term protection would be provided, wilderness values are expected to remain undisturbed on an additional 8,190 acres in the portion recommended nonsuitable.
Locatable Mineral Exploration and Development	The 20,750 acres recommended for wilderness designation would be withdrawn from mineral entry subject to proven valid existing rights. Exploration and development could continue on the remaining 5,400 acres not recommended for wilderness designation. Mineral exploration or development is not expected in either portion of this WSA. There would be no significant impacts because of the low development potential for all minerals.	The entire 26,150 acres in the WSA would be withdrawn from mineral entry and exploration with the exception of up to approximately 80 acres dependent on the validity of four existing mining claims. There would be no significant impacts because of the low development potential for all minerals.	The entire WSA would remain open to mineral entry; however, exploration or development is not expected. There would be no significant impacts because of low development potential for all minerals.	The 17,000 acres recommended for wilderness designation would be withdrawn from mineral entry subject to proven valid existing rights. Exploration and development could continue on the remaining 9,150 acres not recommended for wilderness designation. Mineral exploration or development is not expected in either portion of this WSA. There would be no significant impacts because of the low development potential for all minerals.



RESOURCE	PROPOSED ACTION			
	Alternative C - Partial Wilderness—I	Alternative A All Wilderness	Alternative B No Wilderness	Alternative D - Partial Wilderness—II
Timber Production	Wilderness designation would preclude harvest of 12,882 cords of firewood; however, 3,560 Mbf of the total 5,142 Mbf of sawtimber would be produced. This represents substantially less than 1 percent of the sawtimber in the RGRA and nearby national forest land.	Wilderness designation would preclude harvest of 12,882 cords of firewood and 5,142 Mbf of sawtimber. This represents substantially less than 1 percent of the firewood and sawtimber in the RGRA and nearby national forest land.	About 12,882 cords of firewood and 5,142 Mbf of sawtimber in this WSA would be produced. This represents substantially less than 1 percent of the firewood and sawtimber in the RGRA and nearby national forest land.	All of the total 12,882 cords of firewood in the WSA and 3,560 Mbf of the total 5,142 Mbf of sawtimber would be produced. This represents substantially less than 1 percent of the firewood and sawtimber in the RGRA and nearby national forest land.
Wildlife Habitat and Population	Existing wildlife habitat would be maintained on both the 20,750 acres recommended and the 5,400 acres not recommended for wilderness designation. Wildlife populations would remain at 650 mule deer, 50 bighorn sheep, and 225 turkey.	Wildlife habitat would be protected and current populations of approximately 650 mule deer, 50 bighorn sheep, and 225 turkey would be unchanged.	Wildlife habitat would be maintained and current populations of approximately 650 mule deer, 50 bighorn sheep, and 225 turkey would be unchanged.	Existing wildlife habitat would be maintained on both the 17,000 acres recommended and the 9,150 acres not recommended for wilderness designation. Therefore, wilderness populations would remain at 650 mule deer, 50 bighorn sheep, and 225 turkey.
Recreation Use	The existing 2,000 annual recreation days would be maintained. Recreation use would occur in a wilderness setting on the 20,750 acres recommended for wilderness designation and in a predominantly primitive back-country setting on the remaining 5,400 acres not recommended.	Elimination of back-country vehicle use would result in a decrease of 1,200 annual recreation days, which is a reduction of 60 percent of existing use. All recreation use would occur in a wilderness setting.	The existing 2,000 annual recreation days would be maintained. All recreation use would occur in a predominantly primitive back-country setting.	The existing 2,000 annual recreation days would be maintained. Recreation use would occur in a wilderness setting on the 17,000 acres recommended for wilderness designation and in a predominantly primitive back-country setting on the remaining 9,150 acres not recommended.

TABLE 2-2  
COMPARISON OF IMPACTS  
UPPER GRAPE CREEK WSA (017)

RESOURCE	PROPOSED ACTION	
	Alternative B - No Wilderness	Alternative A - All Wilderness
Wilderness Values	Of the 10,200 acres not recommended for designation, wilderness values would be lost for the long term on approximately 1,930 acres and the short term on an additional 615 acres. Although long-term protection would not be provided under this alternative, the remaining 7,655 acres would probably remain undisturbed in the foreseeable future and retain their wilderness values.	Wilderness values would be preserved on the entire WSA and given long-term protection.
Locatable Mineral Exploration and Development	The entire WSA would remain open to mineral entry; however, exploration or development is not expected. There would be no significant impacts because of the low development potential for all minerals.	The entire 10,200 acres would be withdrawn from mineral entry and exploration with the exception of up to approximately 620 acres dependent on the validity of 31 existing mining claims. There would be no significant impacts because of low development potential for all minerals.
Forage Production and Livestock Management	Range improvement projects would result in an additional 60 allocated AUMs, which is an 8 percent increase.	The current 800 AUMs would be maintained.
Timber Production	About 26,840 cords of firewood and 28,886 Mbf of sawtimber in this WSA would be produced. This represents about 1 percent of the firewood and sawtimber in the RGRA and nearby national forest land.	Wilderness designation would preclude the harvest of 26,840 cords of firewood and 28,886 Mbf of sawtimber. This represents about 1 percent of the firewood and sawtimber in the RGRA and nearby national forest land.

## Continuation - Upper Grape Creek

RESOURCE	PROPOSED ACTION	
	Alternative B - No Wilderness	Alternative A - All Wilderness
Wildlife Habitat and Population		
Terrestrial	Wildlife habitat and species distribution would improve and wildlife populations would increase by 100 mule deer and 100 turkey. This would be a 37 percent increase of mule deer in the WSA and 1 percent in the RGRA. Turkey would increase by 133 percent in the WSA and 8 percent in the RGRA.	Wildlife habitat would be protected and current populations of approximately 270 mule deer and 75 turkey would be unchanged.
Aquatic	Existing riparian habitat along Grape Creek would improve and game fish in Grape Creek would increase by 500 percent or 50 pounds per acre and nongame fish would decrease by 56 percent or 50 pounds per acre.	Existing riparian habitat would be protected and current game fish populations in Grape Creek of approximately 10 pounds per acre and nongame fish populations of approximately 90 pounds per acre would be maintained.
Recreation Use	An additional annual 60 recreation days, which is a 22 percent increase, are expected. All recreation use would occur in a predominantly primitive back-country setting.	Elimination of back-country vehicle use would result in a decrease of 35 annual recreation days, which is a reduction of 13 percent of existing use. All recreation use would occur in a wilderness setting.

TABLE 2-2  
COMPARISON OF IMPACTS  
SAND CASTLE WSA (135)

RESOURCE	PROPOSED ACTION	
	Alternative B - No Wilderness	Alternative A - All Wilderness
Wilderness Values	Although long-term protection would not be provided under this alternative, the entire 1,644 acres would probably remain undisturbed in the foreseeable future and retain their wilderness values.	Wilderness values would be preserved on the entire WSA and given long-term protection.
Locatable Mineral Exploration and Development	The entire WSA would remain open to mineral entry; however, exploration or development is not expected. There would be no significant impacts because of the low development potential for all minerals.	The entire 1,644 acres would be withdrawn from mineral entry and exploration with the exception of proven valid existing rights. Mineral exploration or development is not expected. There would be no significant impacts because of the low development potential for all minerals.
Wildlife Habitat and Population	The existing wildlife habitat would be maintained; however, there would continue to be no significant numbers of wildlife in the WSA.	The existing wildlife habitat would be protected; however, there would continue to be no significant numbers of wildlife in the WSA.
Recreation Use	The existing 75 annual recreation days would be maintained. All recreation use would occur in a predominantly primitive back-country setting.	Elimination of back-country vehicle use would result in a decrease of 70 annual recreation days, which is a reduction of 93 percent of existing use. All recreation use would occur in a wilderness setting.

**CHAPTER THREE**  
**AFFECTED ENVIRONMENT**





TABLE 2-2  
COMPARISON OF IMPACTS  
SAN JUAN HILLS WSA (141)

RESOURCE	PROPOSED ACTION		
	Alternative B - No Wilderness	Alternative A - All Wilderness	Alternative C - Partial Wilderness
Wilderness Values	Although long-term protection would not be provided under this alternative, the entire 10,240 acres would probably remain undisturbed in the foreseeable future and retain their wilderness values.	Wilderness values would be preserved on the entire WSA and given long-term protection.	Of the total 10,240 acres in this WSA, 7,440 would be designated wilderness and given long-term protection. Although long-term protection would not be provided under this alternative, wilderness values would be expected to remain undisturbed in the foreseeable future on the remaining 2,800 acres.
Locatable Mineral Exploration and Development	The entire WSA would remain open to mineral entry; however, exploration or development is not expected. There would be no significant impacts because of the low development potential for all minerals.	The entire 10,240 acres would be withdrawn from mineral entry and exploration with the exception of up to approximately 1,340 acres dependent on the validity of 67 existing mining claims. There would be no significant impacts because of the low development potential for all minerals.	The 7,440 acres recommended for wilderness designation would be withdrawn from mineral entry subject to proven valid existing rights. Exploration and development could continue on the remaining 2,800 acres not recommended for wilderness designation. Mineral exploration or development is not expected in either portion of this WSA. There would be no significant impacts because of the low development potential for all minerals.
Wildlife Habitat and Population	The existing wildlife habitat would be maintained and current populations of approximately 150 mule deer and 85 antelope would be unchanged.	Wildlife habitat would be protected and current populations of approximately 150 mule deer and 85 antelope would be unchanged.	Existing wildlife habitat would be maintained on both the 7,440 acres recommended and the 2,800 acres not recommended for wilderness designation. Therefore, wildlife populations would remain at 150 mule deer and 85 antelope.

## Continuation - San Luis Hills

RESOURCE	PROPOSED ACTION		
	Alternative B - No Wilderness	Alternative A - All Wilderness	Alternative C - Partial Wilderness
Recreation Use	The existing 350 annual recreation days would be maintained. All recreation use would occur in a predominantly primitive back-country setting.	Elimination of back-country vehicle use would result in a decrease of 190 annual recreation days, which is a reduction of 54 percent of existing use. All recreation would occur in a wilderness setting.	Elimination of back-country vehicle use would result in a decrease of 155 annual recreation days, which is a 44 percent decrease from existing use in the entire WSA. Recreation use would occur in a wilderness setting on the 7,440 acres recommended for wilderness designation and in a predominantly primitive back-country setting on the remaining 2,800 acres not recommended.

## CHAPTER 3 AFFECTED ENVIRONMENT

### INTRODUCTION

This chapter briefly describes, by wilderness study area (WSA), those resources that were identified as issues in Chapter 1. Where impacts to certain resources were not identified as issues in Chapter 1, descriptions are omitted. The affected environment will be described in two sections: 1) general description of the affected environment and 2) unit-by-unit description of the environment (all resources identified as issues in Chapter 1 are described in each WSA).

### GENERAL DESCRIPTION

**Wilderness Resources:** The majority of the existing wilderness areas located in the contiguous United States is found within the mountainous portions of the western United States. As identified by the Baily-Kuchler Ecosystem map of ecoregions in the United States, the wilderness areas are primarily located in the Pacific, Sierran, or the Rocky Mountain Forest Province. The WSAs contain some dominant physical and biological characteristics that can be integrated and classified into regional land units called ecosystems. These systems and landforms have been analyzed as they relate to the WSAs. The classification of ecosystems is based on an integration of the natural factors of climate, vegetation, soils, and landforms. Wilderness designation presents an opportunity to preserve, in an unimpaired condition for future generations, examples of the basic ecosystems and landforms present in the United States. Although there are many varied land classification systems available, BLM has selected the Baily-Kuchler Ecosystems of the United States system (Baily, 1976 and Kuchler, 1966). This system was selected because it is a land classification system that facilitates planning at the national level. In addition, it provides a broad synthesis of current knowledge about the ecosystem geography of the country. It also serves as a useful reference for those who desire an overview on a comparative basis for ecosystem and landform representation in existing and potential National Wilderness Preservation System (NWPS) units. All the WSAs considered in this document are in the pine-Douglas-fir forest (approximately 64,830 acres), western spruce-fir forest (6,000 acres), saltbrush-greasewood (1,000 acres), or fescue-mountain muhly-prairie (10,840 acres) vegetative classification of the Rocky Mountain Forest Province. In addition to Colorado, this province extends into the following

states: Wyoming, Utah, Montana, Idaho, Oregon, Washington, and New Mexico. In Colorado, almost half the state is considered in the Rocky Mountain Forest Province. Diversity in the National Wilderness Preservation System will only be discussed for the San Luis Hills WSA since it is the only WSA that would add to the diversity of that system. (For more detailed information on ecoregions and vegetative classifications, please refer to the management situation analysis (MSA), which is available in the Canon City District Office.)

The MSA addressed diversity in the National Wilderness Preservation System in detail. See Appendix B and D in the MSA for summary charts showing this diversity. Charts in Appendix B include 1) expanding the diversity of natural systems and features as represented by ecosystems and landforms and 2) expanding the opportunities for solitude or primitive recreation within 1 day of driving time (5 hours) of major population centers. Appendix D of the MSA shows all areas either already designated or recommended to Congress as wilderness within both the state and the surrounding region.

**Mineral Resources:** Potential of all areas recommended for wilderness designation will be further inventoried and analyzed by the U.S. Geological Survey/Bureau of Mines. The Bureau of Mines has studied three WSAs and reports for the following are available: Beaver Creek—Bureau of Mines Open-file Report MLA 32-85; Browns Canyon—Bureau of Mines Open-file Report MLA 70-85; and Sand Castle—Bureau of Mines Open-file Report MLA 24-84. The inventory results will accompany the recommendations when they are forwarded to the President and the Congress.

**Timber Resources:** Quantities of sawtimber (Mbf) in the WSAs have been related to total resource area and United States Forest Service (USFS) quantities for comparison purposes. However, the USFS has no category directly comparable to BLM estimates of available cordwood in woodland areas. The USFS harvests "miscellaneous products," which is any timber cut as a result of new road construction for other projects, rights-of-way, etc., and is figured as 30 percent of their Mbf per year. For the sake of analysis we use this figure to compare with our woodlands and cordwood figures.

**Recreation Resources:** Use statistics were derived from observations by BLM personnel, from information submitted by organizations and individuals, and from partial samplings taken in the past. Many of the figures were taken from planning documents. All units are accessible by foot almost every day of the year because of relatively mild climatic conditions.

## CHAPTER 3 AFFECTED ENVIRONMENT

### UNIT-BY-UNIT DESCRIPTION OF ENVIRONMENT

Each WSA is individually assessed for affected environment for each resource value.

#### BROWNS CANYON (002)

This wilderness study area (WSA) contains 6,614 acres of land located approximately 6 miles south of Buena Vista and 7 miles northwest of Salida in Chaffee County. The WSA lies east of the Arkansas River in T. 51 N., R. 8 and 9 E., NMPM and T. 15 S., R. 77 and 78 W., 6th PM. (See Map 3-1.)

#### WILDERNESS RESOURCES

This WSA varies in elevation from about 7,500 feet near the Arkansas River to about 8,400 feet near the eastern boundary. Topography is very rugged with many mountains, hills, canyons, and gulches.

Understory vegetation throughout the area is sparse. Pinon and juniper are the most common vegetative types. Ground cover includes rabbitbrush, blue grama grass, mountain muhly, Indian ricegrass, prickly pear cactus, and yucca.

Although the WSA has a few imprints of man, it is primarily in a natural condition. A few small abandoned mine sites and old cabin foundations remain within the area, which are generally not visible from more than 75 feet because of topographic and vegetative screening. An old way, which was legally closed in 1976, goes through the WSA and is approximately 3 miles long; about three-quarters of a mile is cut and filled, but is not visible except from the site.

Canyons and gulches offer outstanding opportunities for solitude since they block out sights and sounds. These specifically include Little and Middle Cottonwood Creeks, Cottonwood Creek, Spring Gulch, Sawmill Gulch, Green Gulch, and other unnamed gulches. In addition many of the gulches have cottonwood trees providing vegetative screening.

The Denver and Rio Grande Railroad tracks comprise approximately three-fourths of the western boundary. Passing trains (and whistle) can sometimes be heard up to a mile into the WSA depending on a user's location.

The WSA can be reached within 1 day (5 hours) of driving from six major population centers: Denver, Colorado Springs, Pueblo, Boulder, Fort Collins, and Greeley (approximately 2,400,000 people).

#### MINERAL RESOURCES

The WSA is located within the Upper Arkansas Valley, which is a narrow, north tapering, sharply defined graben with a structural style similar to the Basin and Range Province. This graben is believed to be the northward extension of the Rio Grande Rift that extends from northern Mexico to central Colorado. Browns Canyon WSA is just off the eastern edge of the graben structure and the country rock is primarily a gneissic granodiorite and quartz monzonite.

Minor amounts of placer gold have been removed from the gravels in the Arkansas River since 1859. Deposit values are not believed to be significant because of the limited quantity of suitable gravels within the unit. Vein gold has been mined from several areas around the WSA including Turret and the Red and Sedalia Mines. Exploration within the WSA consists of several small exploration excavations, but no value could be identified.

Scattered throughout the WSA are small pegmatitic dikes generally unzoned and consisting mainly of quartz and feldspar with the following accessory minerals in limited quantities: beryl, columbium, tantalum, and mica. The primary interest in these pegmatites is for the accessory minerals; however, because of the small amount and only infrequent appearance of these minerals, development is uneconomical.

There is a small perlite deposit on the east side of Ruby Mountain that is suitable for use as a lightweight aggregate. Development has not occurred in the past because of the small size of the site and the distance to a processing facility.

Current information reveals nine mining claims totaling 180 acres and no mineral leases within the WSA. Six of these claims are in Sec. 18, T. 15 S., R. 77 W., 6th PM. The entire Browns Canyon WSA has low potential for mineral discovery, location, and development.

#### TIMBER RESOURCES

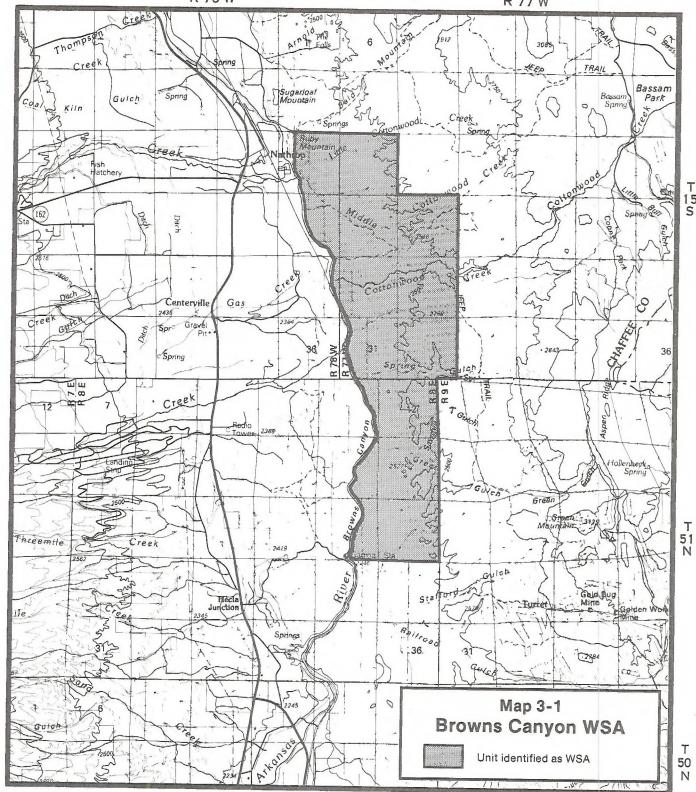
This WSA has mostly pinon pine and juniper on the lower slopes with some Douglas-fir in the higher elevations. Some broad leaf species such as aspen are in the drainage bottoms.

There are 3,910 operable acres of woodlands with a potential harvest of 100,682 cords of pinon and juniper. In addition there are 65 operable acres of productive forest land (PFL) with a potential harvest of 1,976 Mbf of ponderosa pine and Douglas-fir in the WSA.



R 78 W

R 77 W



1 0 1 2 3 MILES

## CHAPTER 3 AFFECTED ENVIRONMENT

In comparison, the Royal Gorge Resource Area (RGRA) has a total of 63,460 operable acres of woodlands with 590,100 cords of firewood and 41,000 operable acres of sawtimber with 240,300 Mbf. The surrounding Pike-San Isabel National Forest has a total of 92,000 acres of woodlands and 150,300 operable acres of PFL.

Estimated operable acres of woodlands in the WSA represent approximately 6 percent of the woodlands in the resource area and about 3 percent of the total woodlands in the resource area and nearby national forest land combined. Estimated acres of PFL in the WSA represent substantially less than 1 percent of the PFL in the resource area and substantially less than 1 percent of the total in the resource area and nearby national forest combined.

### WILDLIFE RESOURCES

This WSA provides habitat yearlong for approximately 160 mule deer and approximately 135 bighorn sheep.

In comparison total wildlife populations in the Royal Gorge Resource Area are estimated at 7,000 mule deer and 300 bighorn sheep. Estimated populations in the WSA represent approximately 2 percent of the mule deer and approximately 45 percent of the bighorn sheep in the RGRA.

The remote and rugged topography also provides important habitat for mountain lion (population figures are unknown) and several species of raptors such as red-tailed hawk and prairie falcon.

### RECREATION RESOURCES

The landscape of the deep and narrow Browns Canyon is dominated by the Arkansas River. Side slopes are characterized by jagged, sculptured rock outcroppings with scattered stands of cottonwoods and willows near the water.

The WSA is basically unchanged by man and is primarily characterized by pinon-juniper vegetation and rugged, rocky hills with six substantial, intermittent drainages leading to the Arkansas River.

With the exception of recreational activity along the Arkansas River and passing trains, the rugged nature of the land isolates the sights and sounds of man from the recreational user.

Recreation use in the WSA totals approximately 25 annual recreation days. Since the southern portion of the WSA is steep and rugged, the majority of this use occurs north of Spring Gulch. This area has outstanding opportunities for primitive and unconfined recreation such as hiking, backpacking, hunting, wildlife photography, and similar activities. Although some back-country vehicle use has previously occurred, it is not permitted under interim wilderness guidelines since there are no existing ways or

trails in the WSA. Brief views of the scenic Collegiate Peaks and the Arkansas Valley are available in some areas within the WSA and offer outstanding opportunities for scenic photography.



### McINTYRE HILLS (013)

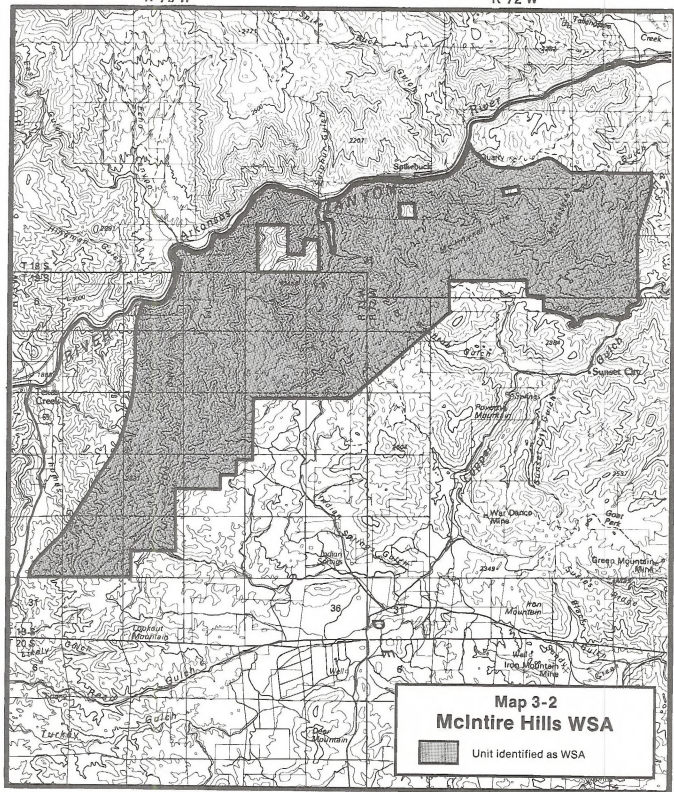
This wilderness study area (WSA) contains 16,800 acres of land located south of U.S. Highway 50 approximately 12 miles west of Canon City in Fremont County. The WSA lies south of the Arkansas River in T. 18 and 19 S., R. 72 and 73 W., 6th PM. (See Map 3-2.) There is a 350-acre state inholding approximately 1 mile southwest of where Sheep Basin meets the Arkansas River. There are also two private inholdings totaling 60 acres located about 1.25 miles east of where Sheep Basin meets the Arkansas River and about 1.25 miles south of Cedar Gulch and the Arkansas River. There are 740 acres of split-estate near the western WSA boundary where BLM administers the surface acres and the state of Colorado owns and administers the subsurface acres.

### WILDERNESS RESOURCES

The WSA varies in elevation from about 5,900 feet near the Arkansas River to 8,100 feet at some of the higher mountain tops such as McIntyre Hills. Topography varies from gently rolling hills and small plateaus to extremely rugged mountains. Drainages generally follow a south to north direction with many side canyons. Vegetation consists primarily of pinon-juniper throughout the unit with some pine and fir in the higher elevations.

R 73 W

R 72 W



T 18 S

T 19 S

T 20 S

1 0 1 2 3 MILES

## CHAPTER 3 AFFECTED ENVIRONMENT

Although the WSA is primarily in a natural condition, it has some imprints of man, which include a way, mineral exploration pits, and an old corral.

Outstanding opportunities for solitude exist throughout the McIntyre Hills WSA. Numerous drainages twist and turn to create areas where visitors can be screened from one another. Vegetation on the hills and mountains also enhances the feeling of solitude.

No known special features occur in this unit. Generally the WSA is very typical of lands in southern Colorado.

The WSA can be reached within 1 day (5 hours) of driving from six major population centers: Denver, Colorado Springs, Pueblo, Boulder, Fort Collins, and Greeley (approximately 2,400,000 people).

### MINERAL RESOURCES

The WSA is located north and east of the Wet Mountains and south of the Thirtynine Mile volcanic field. Major rock units are of Precambrian age and consist generally of migmatitic gneisses and granodiorites. Migmatitic gneisses of this unit host abundant pegmatites. The granodiorite units are variable containing rock types from quartz monzonite to quartz diorite. Sediments of the Webster Park Graben are located immediately to the east of the WSA. Small amounts of Tertiary volcanics are within the WSA. Faulting in the area is predominantly north to northeast trending.

Based on a mineral inventory and available mineral information, the WSA does not have any known economical deposits of critical mineral resource values and appears to have only a minimal possibility for future discoveries. Some exploration and minor developments have occurred in areas around and within the WSA. The major development has been of the many scattered pegmatites within the migmatitic gneiss and granodiorites. The pegmatites are zoned and consist mainly of quartz and feldspar with minor accessory minerals. The major amount of development has occurred outside of the WSA; however, pegmatites do exist within the WSA. Further development of these deposits is uneconomical at the present time because of their size, high production costs, and the shipping charge to users.

Tungsten mineralization has been reported from two prospects outside the WSA and one abandoned mine on an inholding within the WSA. There are no production records from any of these sites and assays taken from the mine within the WSA showed no evidence of tungsten mineralization. The possibilities for discovery of this type of mineralization within the WSA cannot be ruled out; however, there appears to be little interest at the present time.

The possible presence of uranium mineralization similar to that in the Tallahassee mining district of Fremont County

was identified in correspondence concerning this WSA. However, the mineral inventory identified no anomalous areas.

Current information reveals there are 25 mining claims totaling approximately 500 acres within the WSA. The entire McIntyre Hills WSA has low potential for mineral discovery, location, and development.

### LIVESTOCK GRAZING

This WSA contains 700 AUMs and is within two intensively managed allotments. Season of use is July 1 through December 15. The potential natural condition of the WSA is considered predominantly poor for livestock forage production because of heavy pinon-juniper overstory, but is ecologically stable. Major range forage consists mostly of mountain muhly and needle-and-thread grasses; rabbitbrush and pinon also occur. One developed spring is present in Five Points Gulch.

### TIMBER RESOURCES

This WSA has pinon-juniper on the lower slopes with some ponderosa pine and Douglas-fir at higher elevations. Some broad leaf species such as cottonwood and aspen are in the drainage bottoms.

There are 1,190 operable acres of woodlands with a potential harvest of 35,105 cords of pinon and juniper. In addition there are 571 operable acres of productive forest land (PFL) with a potential harvest of 6,977 Mbf of ponderosa pine and Douglas-fir in the WSA.

In comparison, the Royal Gorge Resource Area (RGRA) has a total of 63,460 operable acres of woodlands with 590,100 cords of firewood and 41,000 operable acres of sawtimber with 240,300 Mbf. The surrounding Pike-San Isabel National Forest has a total of 92,000 acres of woodlands and 150,300 operable acres of PFL.

Estimated operable acres of woodlands in the WSA represent approximately 2 percent of the woodlands in the resource area and less than 1 percent of the total woodlands in the resource area and nearby national forest land combined. Estimated acres of PFL in the WSA represent about 1 percent of the PFL in the resource area and considerably less than 1 percent of the total in the resource area and nearby national forest combined.

### WILDLIFE RESOURCES

This WSA provides habitat for 400 mule deer, 50 bighorn sheep, and approximately 100 turkey.

In comparison total wildlife populations in the RGRA are estimated at 7,000 mule deer, 300 bighorn sheep, and 1,200



## LOWER GRAPE CREEK WSA

### LOWER GRAPE CREEK (014)

turkey. Estimated populations in the WSA represent 6 percent of the mule deer, 17 percent of the bighorn sheep, and 8 percent of the turkey in the RGRA.

Various raptors such as golden eagle and prairie falcon nest within the WSA. Bighorn sheep have recently been transplanted into this WSA and are utilizing the northern portion as their home range.

#### RECREATION RESOURCES

This expansive area is characterized by rolling hills covered with pinon-juniper interspersed with steep, intermittent drainages. An occasional rock outcrop can be seen in the unit. The area is in a natural state but the landscape is common. There are no substantial manmade modifications nor intrusions.

This WSA has outstanding opportunities for primitive recreation such as hiking, backpacking, and hunting in a predominantly primitive back-country setting. Trail bike riding occurs in some of the drainages, such as Washtub Gulch along the southern WSA boundary, in the southern part of Five Points Gulch, and the northern portion of Sheep Basin.

There are a total of 105 annual recreation days, which include about 30 annual recreation days (hiking, backpacking, etc.). About 70 percent of these uses occur in Sheep Basin and Five Points Gulch. Hunting use totals about 15 annual hunter days and occurs throughout the WSA. Trail bike use and other back-country vehicle travel totaling about 60 annual recreation days are limited to existing ways and trails. The RGRA has approximately 23,000 annual recreation days of back-country vehicle use.



This wilderness study area (WSA) contains 11,220 acres located approximately 6 miles southwest of Canon City in Fremont and Custer Counties. The WSA lies within T. 19 S., Rs. 71 and 72 W., and T. 20 S., R. 71 W., 6th PM. (See Map 3-3.) There is a 55-acre private inholding approximately 1.5 miles east of Poverty Mountain and a 20-acre private inholding on the west side of Horseshoe Mountain. There are 590 acres of split-estate near the western boundary of the WSA where BLM administers the surface acres and the state of Colorado owns and administers the subsurface acres.

#### WILDERNESS RESOURCES

The WSA varies in elevation from 6,400 feet near Webster Park to an average of 8,300 feet on peaks near Goat Park. Topography is primarily rugged throughout the WSA; however, it becomes very steep and rugged on either side of Grape Creek. Approximately 4 miles of Grape Creek flow through the WSA. The stream and associated riparian vegetation and the canyon are the predominant features within the WSA. Although Grape Creek is the only perennial stream, this WSA contains intermittent drainages such as Sunset City Gulch and Goat Park Gulch, which meander through mountains.

Vegetation in the WSA varies with elevation and availability of water. Although cottonwoods grow in many areas along Grape Creek, pinon and juniper along with some Douglas-fir and ponderosa pine cover the remainder of the WSA. The topography, in addition to the vegetation in some locations, provides screening from sights and sounds both inside and outside the WSA. Because of these factors, this WSA has opportunities for solitude.

Some imprints associated with previous mining and access are in the western portion of the WSA. These include an old gold mine, the remains of a cabin, and two ways. The overall influence of these human imprints detracts from naturalness on approximately 500 acres in this part of the WSA.

In 1881 a narrow gauge railroad was constructed along Grape Creek; however, in 1889 it was abandoned. A few cut banks, rails, and metal poles still remain along Grape Creek. The remaining portion of this railroad grade is a special feature because of the historical significance.

The WSA can be reached within 1 day (5 hours) of driving from six major population centers: Denver, Colorado Springs, Pueblo, Boulder, Fort Collins, and Greeley (approximately 2,400,000 people).



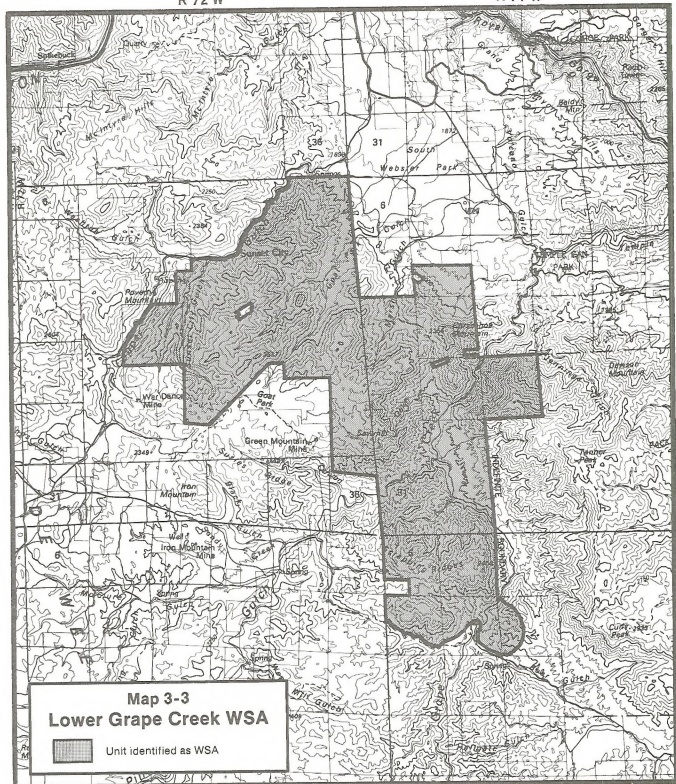
R 72 W

R 71 W

T 18 S

T 19 S

T 20 S



## LOWER GRAPE CREEK WSA

### MINERAL RESOURCES

The WSA is located on the northern end of the Wet Mountains. Most of the rock exposed in the WSA is Precambrian in age and consists mainly of migmatitic gneisses of sedimentary and volcanic origin. These gneisses have been intruded by granodiorites in several locations within the WSA. The WSA has been highly faulted and falls into prominent northwest-southeast and northeast-southwest trends. The northern portion of Lower Grape Creek WSA contains sedimentary units preserved in the Webster Park Graben.

This WSA has a favorable zone of approximately 2,000 acres showing moderate potential for discovery, location, and possible development of base and precious metals; i.e., copper, lead, and silver. This favorable zone is located between Horseshoe Mountain in Secs. 17 and 21, T. 19 S., R. 71 W. and the Green Mountain Mine in Secs. 25 and 26, T. 19 S., R. 72 W., 6th PM. This area was productive for the previously mentioned minerals around the turn of the century with development activity localized to small ore zones readily identifiable from surface exposures. An examination of these development sites revealed the presence of minor reserves of ore that are marginally profitable at current metal prices and production costs. Some interest in mining the area has been expressed by several mining and exploration firms as well as by individuals knowledgeable about the geology and mineral potential of the area.

The remaining 9,220 acres in the WSA are considered to have low potential for mineral discovery.

Current information reveals there are 156 mining claims totaling approximately 3,120 acres within the WSA. The greatest concentration of these claims occur around the western side of Horseshoe Mountain.

### LIVESTOCK GRAZING

The WSA contains 231 AUMs and is within one intensively managed allotment. Major range forage species are mountain muhly and needle-and-thread. The potential natural condition of the majority of the WSA for forage production is poor because of heavy pinon-juniper overstory. The good forage production area (approximately 100 acres) in the Grape Creek riparian zone has been overgrazed. Recently the season of use was changed to July 1 through October 15 and about three-quarters mile of gap fencing was installed under BLM interim management guidelines. The gap fence is used to keep cattle out of the riparian zone along Grape Creek until the range condition in this zone improves from poor to good. After the range condition improves, the fence will be used to maintain the existing condition by limiting cattle to certain portions of the riparian zone.

### TIMBER RESOURCES

This WSA has mostly pinon and juniper on the lower slopes with some ponderosa pine and Douglas-fir at higher elevations. Some broad leaf species such as cottonwood and aspen are in the drainage bottoms.

There are 1,910 operable acres of woodlands with a potential harvest of 43,930 cords of pinon and juniper. In addition there are 389 operable acres of productive forest land (PFL) with a potential harvest of 8,558 Mbf of ponderosa pine and Douglas-fir in the WSA.

In comparison, the Royal Gorge Resource Area (RGRA) has a total of 63,460 operable acres of woodlands with 590,100 cords of firewood and 41,000 operable acres of sawtimber with 240,300 Mbf. The surrounding Pike-San Isabel National Forest has a total of 92,000 acres of woodlands and 150,300 operable acres of PFL.

Estimated operable acres of woodlands in the WSA represent approximately 3 percent of the woodlands in the resource area and about 1 percent of the total woodlands in the resource area and nearby national forest land combined. Estimated acres of PFL in the WSA represent less than 1 percent of the PFL in the resource area and considerably less than 1 percent of the total in the resource area and nearby national forest combined.

### WILDLIFE RESOURCES

#### *Terrestrial*

This WSA provides habitat yearlong for 280 mule deer, 28 bighorn sheep, approximately 100 turkey, and small populations of mountain lion and black bear.

In comparison total wildlife populations in the RGRA are estimated at 7,000 mule deer, 300 bighorn sheep, and 1,200 turkey. Estimated populations in the WSA represent 4 percent of the mule deer, 9 percent of the bighorn sheep, and 8 percent of the turkey in the RGRA.

Small birds and mammals are abundant near water, but occur throughout the WSA. Several species of raptors are also in the area.

#### *Aquatic*

Grape Creek flows through the WSA providing a stream fishery habitat. This is the only perennial stream in the WSA and provides approximately 4 miles of riparian and aquatic habitat. Before livestock were excluded from grazing along Grape Creek, the riparian habitat was in poor condition and contributed to the decrease of the brown and rainbow trout fishery and an increase in the nongame (mainly suckers)

## CHAPTER 3 AFFECTED ENVIRONMENT

fishery. Since livestock grazing has been excluded along Grape Creek, the riparian habitat has been improving.

Fish populations in streams of the size and structure of Grape Creek, in this general area, vary between 80 and 120 pounds per acre. It is believed that Grape Creek is in this category; however, a detailed inventory has not been completed. Therefore, in this document, the figure of 100 pounds per acre is used. At this time about 90 percent of the total fish population is made up of nongame species and the remainder is game species.

### RECREATION RESOURCES

The topography in the Lower Grape Creek WSA is steep and rugged with rather sparse vegetation.

This WSA has outstanding opportunities for primitive recreation such as hiking, horseback riding, photography, and backpacking in a predominantly primitive back-country setting. Some back-country vehicle use occurs on a number of dead-end spurs around the western perimeter of the WSA and along portions of Grape Creek; however, topography limits this use in other locations within the WSA. This back-country vehicle use occurs primarily along Grape Creek with some use occurring in Sunset City Gulch, Goat Park Gulch, and Marsh Gulch.

There are a total of 350 annual recreation days, which include about 100 annual recreation days of hiking and backpacking and 125 annual angler days. All of the fishing and about 90 percent of the other uses occur along the Grape Creek corridor. Hunting use totals about 25 annual hunter days and occurs throughout the WSA. Trail bike use and other back-country vehicle travel totaling about 100 annual recreation days are limited to existing ways and trails. The RGRA has approximately 23,000 annual recreation days of back-country vehicle use.

The Grape Creek corridor is the major scenic attraction within this WSA. Sidewalls are steep and rugged. Riparian vegetation along the creek is attractive. Outside the corridor, lands are moderately sloping to steep and rugged and are interspersed with narrow drainages containing dry, sandy streambeds.



### BEAVER CREEK (016)

This wilderness study area (WSA) contains 26,150 acres located 10 miles northeast of Canon City in Fremont, Teller, and El Paso Counties. The WSA lies within T. 16 S., Rs. 67, 68, and 69 W.; T. 17 S., Rs. 68 and 69 W., 6th PM. (See Map 3-4.)

The Colorado Division of Wildlife (DOW) administers state land (870 acres) along the streambed of Beaver Creek for riparian habitat and fisheries. This is the only non-Federal inholding. A memorandum of understanding between BLM and DOW is intended to ensure compliance with the guidelines set forth in the *BLM Interim Management Policy and Guidelines for Land Under Wilderness Review* dated December 12, 1979. If the WSA is designated wilderness, this memorandum would continue to be in effect; if the WSA is not designated wilderness, the memorandum would be terminated. No projects are planned by the DOW.

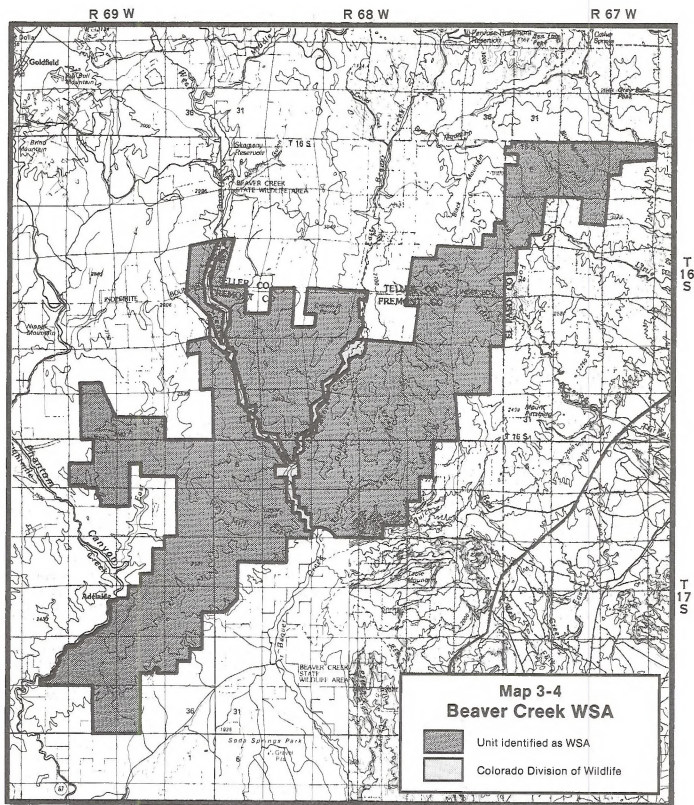
### WILDERNESS RESOURCES

This WSA contains variations in topography from rough, rocky rolling hills in the southern portion to high, rugged, steep peaks over 9,000 feet in the northern portion. There are many deep canyon drainages. Sedimentary uplifts, fault controlled streams, and differential weathering have created this extremely rugged and diversified topography. This is highly representative of the physical features of the Rocky Mountain Front Range in Colorado. The flora of this WSA varies from areas of semiarid vegetation, to riparian areas along streams, to conifer/pine forest mixes in the higher elevations. This WSA is unique in that it represents one of the few primitive/semiprimitive zones of its size along the southern Colorado Front Range that is undeveloped and unroaded.

There are outstanding opportunities for primitive and unconfined recreation within the WSA. The tremendous variation in topography, in combination with the variety of vegetation, provides this WSA with outstanding opportunities for solitude. There are hundreds of sites throughout the WSA where one may experience the feeling of aloneness within the natural setting. Beaver Creek itself, the East and West forks of this creek, West Mill Creek, and Trail Gulch are excellent examples of a solitude experience provided by topographic and vegetative screening. There are no outside sights nor sounds that would affect this solitude within the WSA.

The WSA can be reached within 5 hours of driving from six major population centers: Denver, Colorado Springs, Pueblo, Boulder, Fort Collins, and Greeley (approximately 2,400,000 people). In fact within 1 hour of driving time (Colorado Springs and Pueblo), there are approximately 500,000 people.





## CHAPTER 3 AFFECTED ENVIRONMENT

### MINERAL RESOURCES

The WSA is located on the southern end of the Front Range with the major rock units of the area consisting of granites and migmatitic gneisses and schists. The southern portion of the WSA has several different sedimentary units of Paleozoic age that form the northeast-southwest trending foothills of the WSA. The major geologic structure of the entire area is the Pikes Peak Batholith to the north.

Interest for mineral resources within the WSA has been limited to the exploration of small pegmatites and fluorite. Some fluorite development occurred during the middle to late 1950s; however, no production figures are available. Production of fluorite from the WSA was minor and hand sorting of the ore was required. Insufficient reserves remain at the site to justify further development and it is unlikely that new reserves would be discovered.

The pegmatites within the WSA are small and for the most part unzonned. Pegmatites are scattered throughout the area, but are so small that very few sites have been explored, the largest of which is located in Trail Gulch. The resource value of these pegmatites, because of size and location, is low.

Minor development work for manganese has been done in Sec. 26, T. 17 S., R. 69 W., 6th PM from a strata bound deposit situated between Ordovician sediments and Precambrian metamorphics. The deposit is believed to be isolated and no evidence for continuation of this mineralization has been identified within the WSA.

There are currently no known deposits of uranium within the WSA and the only anomalous values identified are associated with the fluorite in West Mill Gulch. A mineral inventory of the WSA identified no significant uranium anomalies and little potential appears to exist in the area.

The northwest portion of the WSA is only 5 miles from the Cripple Creek-Victor mining area. However, no known deposits of vein gold have been located or developed. A relatively small amount of placer gold has been obtained from gravel in Beaver Creek proper; however, there are no known reserves in the WSA.

Mineral resources were indicated as being present or having potential based on information collected during the inventory process. Identified areas of potential mineralization or areas having been previously prospected for minerals were field checked to determine the mineral resource value present.

Based on the information used, the area is considered to have low potential for the discovery or development of mineral resources. Current information reveals there are four mining claims in the WSA totaling approximately 80 acres.

### TIMBER RESOURCES

The unit encompasses a wide variation of timber types and as a result there is high species diversity. Pinon pine and juniper are abundant; other dominant species include ponderosa pine and Douglas-fir. White fir, spruce, and aspen are also present.

There are 493 operable acres of woodlands with a potential harvest of 12,882 cords of pinon and juniper. In addition there are 177 operable acres of productive forest land (PFL) with a potential harvest of 5,142 Mbf of ponderosa pine and Douglas-fir in the WSA.

In comparison, the Royal Gorge Resource Area (RGRA) has a total of 63,460 operable acres of woodlands with 590,100 cords of firewood and 41,000 operable acres of sawtimber with 240,300 Mbf. The surrounding Pike-San Isabel National Forest has a total of 92,000 acres of woodlands and 150,300 operable acres of PFL.

Estimated operable acres of woodlands in the WSA represent about 1 percent of the woodlands in the resource area and substantially less than 1 percent of the total woodlands in the resource area and nearby national forest land combined. Estimated acres of PFL in the WSA represent less than 1 percent of the PFL in the resource area and substantially less than 1 percent of the total in the resource area and nearby national forest combined.

### WILDLIFE RESOURCES

This WSA is so vast that virtually all habitat types common in this area are represented. The terrain is extremely rough and unroaded. The WSA provides habitat for 650 mule deer, 50 bighorn sheep, 225 turkey, 8 mountain lion, and unknown populations of black bear.

In comparison total wildlife populations in the RGRA are estimated at 7,000 mule deer, 300 bighorn sheep, and 1,200 turkey; populations of black bear are also unknown in the resource area. Mountain lion populations in the Beaver Creek WSA are estimated at one lion per 5 square miles; averages for the RGRA are approximately one lion per 10 to 20 square miles. Estimated wildlife populations in the WSA represent 4 percent of the mule deer, 10 percent of the bighorn sheep, and 8 percent of the turkey in the RGRA.

### RECREATION RESOURCES

Outstanding opportunities for primitive and unconfined recreation are present in the Beaver Creek WSA because of a combination of several factors.

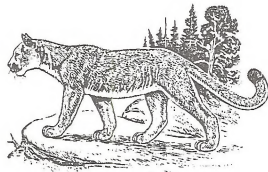
The Beaver Creek WSA is cut by very steep drainages with steep angular walls heavily covered with evergreens. Bare rock outcrops and fairly extensive grass slopes irregularly

## UPPER GRAPE CREEK WSA

dot the area. Both West Beaver and East Beaver Creeks meander through miles of jagged walls with interesting and diverse vegetation and no significant intrusions.

Topographic variation, unique geologic features, diverse plant and animal life, the creeks, and several access trails contribute to opportunities for hiking, backpacking, horseback riding, photography, fishing, hunting, and general sightseeing. In general, the number of activities available and the quality of the associated experience provide this WSA with outstanding opportunities for a primitive and unconfined type of recreation.

There are a total of 2,000 annual recreation days in the Beaver Creek WSA, which include about 700 annual recreation days of hiking, backpacking, and fishing. Although all the fishing occurs in Beaver Creek, about 90 percent of the hiking and backpacking occur in Trail Gulch and along West Mill Creek and Beaver Creek. Hunting use totals about 100 annual hunter days and occurs throughout the WSA. Hiking, car camping, and some back-country vehicle use occur along the western boundary near Phantom Canyon and totals approximately 1,200 annual recreation days.



### UPPER GRAPE CREEK (017)

This wilderness study area (WSA) contains 10,200 acres located approximately 10 miles southwest of Canon City in Fremont and Custer Counties. The unit lies within T. 20 S., Rs. 71 and 72 W., and T. 21 S., Rs. 71 and 72 W., 6th PM. (See Map 3-5.) There are two 15-acre private inholdings approximately 1.5 miles south of Hellgate Gulch along the eastern WSA boundary. There are also 360 acres of split-estate about one-half mile south of the beginning of Western Gulch.

### WILDERNESS RESOURCES

Elevation in this WSA varies from 7,000 to 8,100 feet. The western portion of the WSA contains rolling hills; the balance is mountainous with rugged, steep topography. Vegetation is rather sparse—mostly pinon and juniper. Approximately 7 miles of Grape Creek flow through the WSA. The stream and associated riparian vegetation and the canyon are the predominant features within the WSA. Although Grape Creek is the only perennial stream, this WSA contains intermittent drainages, such as Granite Gulch, which meander through mountains.

Opportunities exist for solitude along Grape Creek and in some of the gulches in the western portion of the unit such as West Mill Gulch and Granite Gulch. Grape Creek runs from south to north through the unit and is surrounded by cliffs and mountains on both sides.

In 1881 a narrow gauge railroad was constructed along Grape Creek; however, in 1889 it was abandoned. A few cut banks, rails, and metal poles still remain along the creek. This remaining portion of the railroad grade is a special feature because of the historical significance.

The WSA can be reached within 1 day (5 hours) of driving from six major population centers: Denver, Colorado Springs, Pueblo, Boulder, Fort Collins, and Greeley (approximately 2,400,000 people).

### MINERAL RESOURCES

This WSA is located on the northern end of the Wet Mountains. Most of the rock exposed in the unit is Precambrian in age and consists mainly of migmatitic gneisses of a sedimentary and volcanic origin. These gneisses have been intruded by granodiorites in several locations within the WSA. The WSA has been highly faulted and falls into predominantly northwest-southeast and northeast-southwest trends.

Only minor anomalous findings for copper were found in this WSA. There has been very little past or present known exploration in this area. The potential for discovery of economic copper mineralization is low.

The geochemical analysis for lead in this area did not identify any areas of highly anomalous values; however, an interesting trend was identified paralleling the western flank of the Wet Mountains. This trend appears to extend from the Terrible Mine located in Sec. 18, T. 21 S., R. 70 W., northwestward to the area near the Horseshoe Mine in Sec. 15, T. 19 S., R. 71 W., 6th PM. This trend would be expressed in the extreme northeastern corner of the WSA. Geochemical values for lead along this potential trend reach a maximum value of 30 ppm. This value, although anomalous in relation to other values for lead within this WSA, does not represent a significant exploration target. A small deposit of base metals



R 71 W



3-14

## UPPER GRAPE CREEK WSA

is located immediately north of the WSA along East Pierce Gulch. This site has been worked intermittently in the past; however, specific information on dates and amount of production is unavailable. This site shows up as a small isolated anomaly for lead on the geochemical survey. The potential for discovery of a lead deposit within the WSA is low based on the geochemical values present and absence of any known exploration interest in this area.

Geochemically anomalous areas for molybdenum are present in the area of Democrat Creek. Values present for this area are a maximum of 10 ppm indicating weak to moderate enrichment. There is no known past nor present exploration or production in this area. This resource is not considered significant.

The majority of the known thorium veins is located immediately south of the WSA. These veins occur in shattered, limonite stained materials along faults in the Precambrian crystalline rocks. This type of environment occurs within the WSA. The geochemical study shows no areas of significant anomalous values within the WSA.

There are no significant geochemical anomalies for zinc within this WSA; however, slightly elevated values do exist. Distribution is similar to that identified previously for lead. According to available information, the potential for discovery of zinc is low.

The Upper Grape Creek WSA is considered to have low potential for mineral discovery. Current information reveals there are 31 mining claims within the WSA totaling approximately 620 acres.

### LIVESTOCK GRAZING

The WSA contains 800 AUMs within one intensively managed allotment. Major range forage species are mountain muhly and needle-and-thread. The potential natural condition of the majority of the WSA for forage production is poor because of heavy pinon-juniper overstory. The good forage production area (approximately 150 acres) in the Grape Creek riparian zone has been overgrazed. A deferred grazing system has been implemented in this WSA and should result in the improvement of the riparian zone along Grape Creek from poor to fair/good within 10-20 years.

### TIMBER RESOURCES

Pinon-juniper exists on the lower slopes with some ponderosa pine and Douglas-fir at higher elevations. Some broad leaf species such as cottonwood and aspen are present in the drainage bottoms.

There are 922 operable acres of woodlands with a potential harvest of 26,840 cords of pinon and juniper. In addition there are 1,003 operable acres of productive forest land

(PFL) with a potential harvest of 28,886 Mbf of ponderosa pine and Douglas-fir in the WSA.

In comparison, the Royal Gorge Resource Area (RGRA) has a total of 63,460 operable acres of woodlands with 590,100 cords of firewood and 41,000 operable acres of sawtimber with 240,300 Mbf. The surrounding Pike-San Isabel National Forest has a total of 92,000 acres of woodlands and 150,300 operable acres of PFL.

Estimated operable acres of woodlands in the WSA represent approximately 1 percent of the woodlands in the resource area and about 1 percent of the total woodlands in the resource area and nearby national forest land combined. Estimated acres of PFL in the WSA represent about 2 percent of the PFL in the resource area and about 1 percent of the total in the resource area and nearby national forest combined.

### WILDLIFE RESOURCES

#### *Terrestrial*

This WSA provides habitat yearlong for approximately 270 mule deer, 75 turkey, and small populations of mountain lion and black bear. Several species of raptors are also in the area.

In comparison total wildlife populations in the RGRA are estimated at 7,000 mule deer and 1,200 turkey. Estimated populations in the WSA represent 4 percent of the mule deer and 6 percent of the turkey in the RGRA.

#### *Aquatic*

Grape Creek flows through the WSA providing a stream fishery habitat. This is the only perennial stream in the WSA and provides approximately 6 miles of riparian and aquatic habitat. Before livestock were deferred from grazing along Grape Creek, the riparian habitat was in poor condition and contributed to the decrease of the brown and rainbow trout fishery and an increase in the nongame (mainly suckers) fishery. Since livestock grazing has been deferred from along Grape Creek, the riparian habitat has been improving.

Fish populations in streams of the size and structure of Grape Creek, in this general area, vary between 80 and 120 pounds per acre. It is believed that Grape Creek is in this category; however, a detailed inventory has not been completed. Therefore, in this document, the figure of 100 pounds per acre is used. At this time about 90 percent of the total fish population is made up of nongame species and the remainder is game species.

## CHAPTER 3 AFFECTED ENVIRONMENT

### RECREATION RESOURCES

The topography in the Upper Grape Creek WSA is steep and rugged with rather sparse vegetation.

This WSA has outstanding opportunities for primitive recreation such as hiking, horseback riding, and backpacking in a predominantly primitive back-country setting. Some back-country vehicle use occurs on a number of dead-end spurs around the southwestern perimeter of the WSA; however, topography limits this back-country vehicle use in other locations within the WSA.

There are a total of 275 annual recreation days, which include about 100 annual recreation days (hiking, backpacking, etc.) and 125 annual angler days. About 90 percent of these uses occur along the Grape Creek corridor. Hunting use totals about 25 annual hunter days and occurs throughout the WSA. Trail bike use and other back-country vehicle travel totaling about 25 annual recreation days are limited to existing ways and trails around the southwestern perimeter of the WSA. The RGRA has approximately 23,000 annual recreation days of back-country vehicle use.

The Grape Creek corridor is the major scenic attraction within this WSA. Sidewalls are steep and rugged. Riparian vegetation along the creek is attractive. Outside the corridor, lands are moderately sloping to steep and rugged and are interspersed with narrow drainages containing dry, sandy streambeds.



### SAND CASTLE (135)

This wilderness study area (WSA) contains 1,644 acres of land consisting of four parcels adjacent to the Great Sand Dunes Wilderness area in Alamosa County. The WSA lies within T. 40 N., R. 12 E., NMPM, and T. 25 S., R. 73 W., 6th PM. (See Map 3-6.)

### WILDERNESS RESOURCES

The WSA contains four parcels contiguous with the Great Sand Dunes Wilderness area with elevations varying from 7,700 to 9,400 feet. These parcels are made up of sandy soils with typical low-growing dune vegetation such as Indian ricegrass and sand dropseed. The largest parcel in Secs. 2 and 11 is an active dune. The small parcel adjacent to the northern WSA boundary is dissected by two intermittent drainages on the side slopes of the Sangre de Cristo Range. Active sand dunes, approximately 60 to 80 feet in height, occur in the WSA.

There are two minor imprints of man. A way, consisting of two wheel ruts kept open solely by the passage of vehicles, parallels the west perimeter of the large parcel in Sec. 2. The second imprint of man is a fence line paralleling the northern border of the wilderness area.

Basically, the proximity of the area to the Great Sand Dunes Wilderness area is the main factor in providing a feeling of solitude. Manmade influences (primarily roads) outside the WSA can be seen. The majority of the wilderness values in this WSA exists because it is contiguous with the Great Sand Dunes Wilderness area.

The WSA can be reached within 1 day (5 hours) of driving from five major population centers: Denver, Boulder, Colorado Springs, and Pueblo, Colorado, and Albuquerque, New Mexico. (approximately 3,100,000 people).

### MINERAL RESOURCES

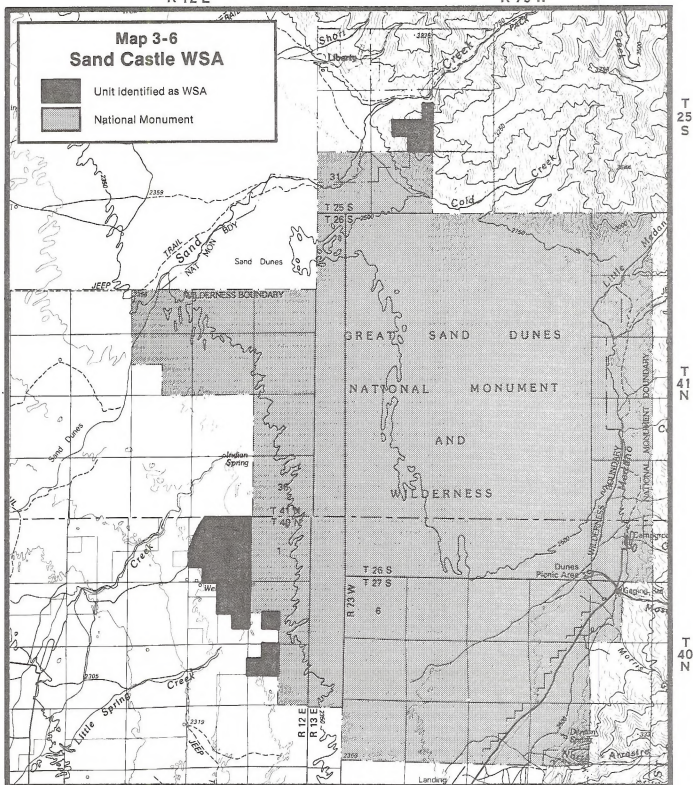
This WSA lies on the eastern edge of a large north-trending topographic depression. It is west of the Sangre de Cristo Range and is adjacent to the Great Sand Dunes Wilderness. Most of the land in this WSA is gradually sloping alluvial fans dissected by small drainages with some exposed rock of sedimentary origin.

Some amounts of barite occur in metamorphic rocks immediately northwest of the upper parcel. No evidence indicates that this extends into the WSA. An accurate determination would require more exploration, but the geologic and economic conditions do not warrant such activities.

A low grade, 5-foot wide iron bearing vein occurs one-quarter mile southwest of the upper parcel of this WSA. There appears to be no structural extension into the WSA. Further exploration would be necessary to delineate this structure, but it is not considered economically feasible for low grade iron deposits.

This WSA is considered to have low potential for the discovery or development of mineral values, and current information reveals there are no mining claims.

Unit Identified as WSA  
National Monument



Y  
Z

1                      0                      1                      2                      3 MILES



## CHAPTER 3 AFFECTED ENVIRONMENT

### WILDLIFE RESOURCES

This WSA has sandy soils, little vegetation, and almost no wildlife habitat. Although wildlife may pass through, none are known to live in the WSA.

### RECREATION RESOURCES

Three of the parcels, contiguous to the Great Sand Dunes Wilderness area, are continuations of the dune area. The parcel of the WSA on the northern boundary of the wilderness area is located on the foothills of the Sangre de Cristo Range.

There are a total of 75 annual recreation days in the Sand Castle WSA, which includes about 5 annual recreation days of hiking and 70 annual recreation days of back-country vehicle use. This use is dispersed throughout the three parcels adjacent to the western boundary of the Great Sand Dunes Wilderness area. Recreation opportunities exist primarily because the WSA is contiguous to the Great Sand Dunes Wilderness area. The parcels adjacent to the dunes have the characteristics to attract and sustain dune buggy activity; however, there are other areas nearby better suited for such use. In comparison, the San Luis Resource Area has approximately 10,000 annual recreation days of back-country vehicle use.



### SAN LUIS HILLS (141)

This wilderness study area (WSA) contains 10,240 acres of land located approximately 3 miles southeast of Manassa. The WSA lies within T. 33 N., Rs. 10 and 11 E. and T. 34 N., Rs. 10 and 11 E., NMPM. (See Map 3-7.)

### WILDERNESS RESOURCES

This WSA, located in the southeastern corner of the San Luis Valley, consists of a series of interconnected hills that

rise from 7,700 feet at the surrounding valley floor to 9,300 feet at the highest point.

The WSA has pinon and juniper stands scattered throughout the area. There are several imprints of man within the WSA including various ways, several small check dams, fence lines, and a mining exploration area that are visible from different locations within the WSA.

Twisting drainages, vegetation, and other topographic contours screen visitors from one another within the WSA. Opportunities for solitude also exist within the gullies along the eastern boundary; however, highways and roads skirt the entire perimeter of the unit and detract from the opportunities for solitude.

As identified by the Baily-Kuchler Ecosystem map of ecoregions in the United States, San Luis Hills is the only WSA in Colorado with sufficient acreage in the fescue-mountain muhly-prairie classification to represent this diverse category of the Rocky Mountain Forest Province.

In Colorado, other than San Luis Hills, there are approximately 600 acres of WSA in the fescue-mountain muhly-prairie classification of the Rocky Mountain Forest Province.

This WSA can be reached within 1 day (5 hours) of driving from Albuquerque, New Mexico, and Pueblo, Colorado (approximately 600,000 people).

### MINERAL RESOURCES

This WSA is located at the confluence of two major structural trends. Ore deposits are commonly localized at such trend intersections. The structural trends involved are the Rio Grande rift and the San Juan volcanic field. The King Turquoise Mine, an intrusive center northeast of the unit, is surrounded by advanced argillic alteration. This type of alteration, apparently extending into the WSA, is often associated with base and precious metal deposits. The WSA contains felsic intrusive bodies that may be related to the alteration zone.

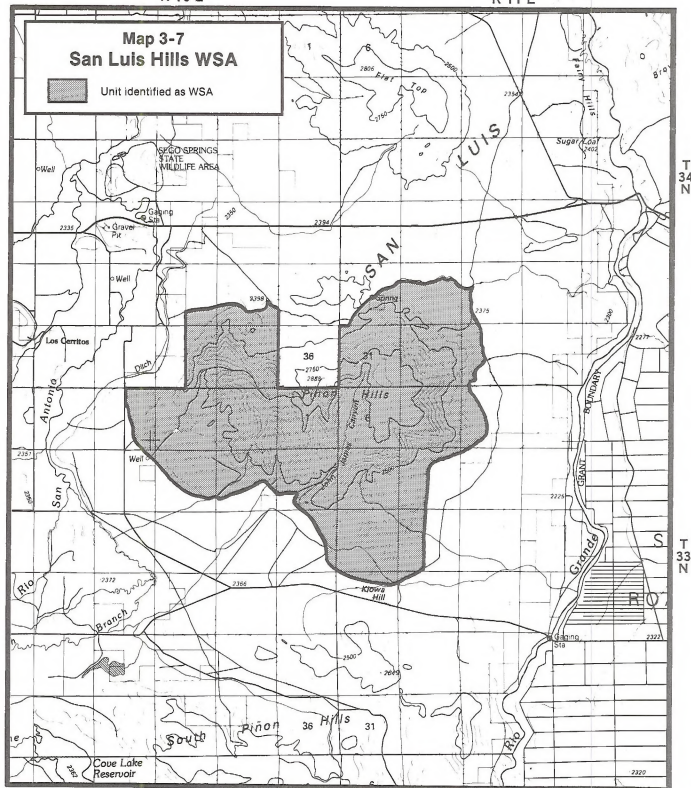
Although alteration characteristics show some potential for deposition of base and precious metals, a reconnaissance geologic investigation provided no evidence of mineralization.

Mineral resources were indicated as being present or having potential based on information collected during the inventory process. Identified areas of potential mineralization or areas having been previously prospected for minerals were field checked to determine the mineral resource value present.

Based on the information used, the WSA is considered to have low mineral potential. Current information reveals there are 67 mining claims within the WSA totaling approximately 1,340 acres.

R 11 E

Unit identified as WSA

T  
34  
N

T  
33  
N

1                      0                      1                      2                      3 MILES

3-19



## CHAPTER 3 AFFECTED ENVIRONMENT

### WILDLIFE RESOURCES

This WSA provides habitat for approximately 150 mule deer and 85 antelope.

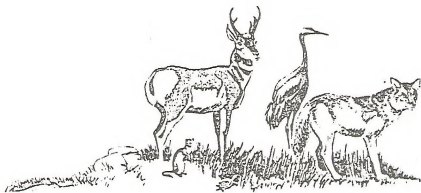
In comparison total wildlife populations in the San Luis Resource Area (SLRA) are estimated at 2,000 mule deer and 2,300 antelope. Estimated populations in the WSA represent 8 percent of the mule deer and 4 percent of the antelope in the SLRA.

### RECREATION RESOURCES

The San Luis Hills WSA is characterized by rolling, interconnected hills interspersed with twisting valleys. The northern portion of the unit has some steep cliffs.

The diversity of the topography provides opportunities for primitive recreation such as hiking, horseback riding, and backpacking in a predominantly primitive back-country setting. The WSA is very accessible for back-country vehicle and trail bike activity, which is limited to existing ways and trails.

A total of approximately 350 annual recreation days, which include about 35 annual recreation days of hiking and backpacking, occurs in John James Canyon and in the higher elevations of the WSA. Hunting use totals about 150 annual hunter days and is dispersed throughout the WSA. Back-country vehicle travel totaling about 165 annual recreation days occurs in John James Canyon, along the western boundary, and in the northeastern portion of the WSA. In comparison, the San Luis Resource Area has approximately 10,000 annual recreation days of back-country vehicle use.



**CHAPTER FOUR**  
**ENVIRONMENTAL CONSEQUENCES**

2000

## CHAPTER 4. ENVIRONMENTAL CONSEQUENCES

### INTRODUCTION

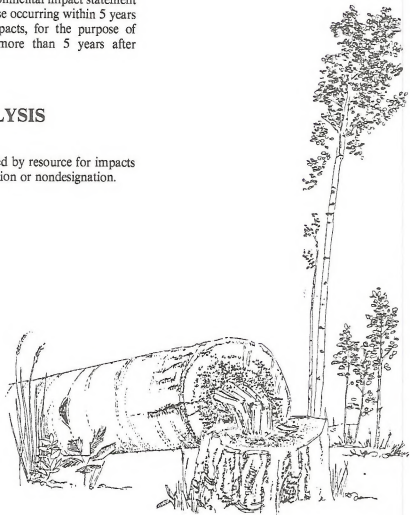
The purpose of this chapter is to analyze the expected impacts and consequences of wilderness designation or nondesignation on the affected environment described in Chapter 3. Each wilderness study area (WSA) is analyzed by the alternatives and by each issue in Chapter 1.

All figures and projections used are approximate and are based on the best available data.

Also for the purpose of this environmental impact statement (EIS), short-term impacts are those occurring within 5 years after designation. Long-term impacts, for the purpose of this EIS, are those occurring more than 5 years after designation.

### UNIT-by-UNIT ANALYSIS

Each WSA is individually assessed by resource for impacts resulting from wilderness designation or nondesignation.



## CHAPTER 4. ENVIRONMENTAL CONSEQUENCES

### BROWNS CANYON (002)

#### PROPOSED ACTION—ALTERNATIVE A - ALL WILDERNESS DESIGNATION

Acres recommended for designation (Map 4-1)	6,614
Total acres in the wilderness study area (WSA)	6,614

##### *Impacts on Wilderness Values*

Wilderness designation of the 6,614 acres recommended as suitable would protect wilderness values on the entire WSA. The outstanding opportunities for solitude in drainages and gulches such as Little and Middle Cottonwood Creeks, Cottonwood Creek, Spring Gulch, Sawmill Gulch, Green Gulch, and other remote areas of the WSA would be protected.

The five spring developments planned to protect the spring sources and enhance wildlife habitat would be compatible with wilderness and would be developed. One-time use of a helicopter would disturb solitude and naturalness along the flight path and in the immediate vicinity of the spring project for less than 1 hour.

Since no mineral exploration nor development is projected on any of the nine mining claims and the firewood and sawtimber harvest would not occur, wilderness values would be preserved on the entire WSA.

*Conclusion: Wilderness values would be preserved on the entire WSA and given long-term protection.*

##### *Impacts on Locatable Mineral Exploration and Development*

Under this alternative, the entire 6,614 acres in the WSA would be withdrawn from mineral entry except for those mining claims with proven valid existing rights prior to designation.

Mineral development could still occur on the existing nine claims (approximately 180 acres), if proven valid. However, since mineral potential for the entire WSA is considered low, no valid rights are anticipated and mineral exploration or development is not expected. Because of the small size and distance from a processing facility, the small perlite deposit on the east side of Ruby Mountain is not expected to be developed.

The withdrawal would not cause significant adverse effects to mineral exploration and development because the development potential for all minerals is low.

*Conclusion: The entire 6,614 acres would be withdrawn from mineral entry and exploration with the exception of up to approximately 180 acres dependent on the validity of nine existing mining claims. There would be no significant impacts because of the low development potential for all minerals.*

##### *Impacts on Timber Production*

Under this alternative, approximately 100,682 cords of pinon and juniper over 160-year rotation age would not be harvested on 3,910 operable acres of woodlands in the WSA as timber production projects.

In comparison there are 63,460 operable acres of woodlands with 590,100 cords of firewood (over 160-year rotation age) in the RGRA. The nearby Pike-San Isabel National Forest plans to harvest about 4,905,000 cords of firewood over the next 160 years. A planned harvest of 100,682 cords of firewood in the WSA would be about 18 percent of the potential harvest in the RGRA and about 2 percent of the total potential harvest in the RGRA and nearby national forest land combined.

The potential 1,976 Mbf of ponderosa pine and Douglas-fir on 65 operable acres of productive forest land (PFL) would not be harvested over 120-year rotation age under this alternative.

In comparison there are 240,300 Mbf (over 120-year rotation age) on 41,000 operable acres of PFL in the RGRA. The nearby Pike-San Isabel National Forest plans to harvest approximately 5,875,000 Mbf of sawtimber over the next 120 years. The planned harvest of 1,976 Mbf of sawtimber in this WSA is about 1 percent of the total potential harvest in the RGRA and substantially less than 1 percent of the potential harvest on the combined RGRA and nearby national forest land.

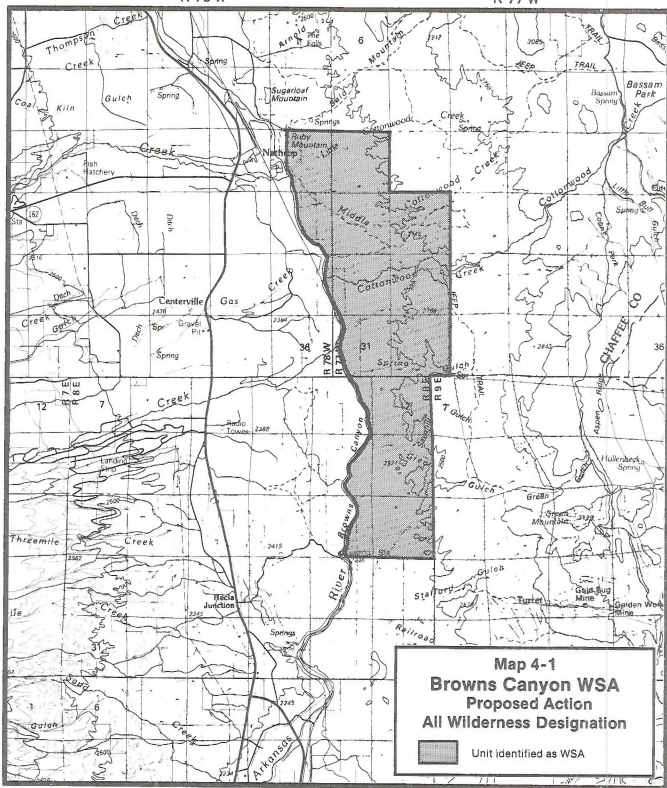
*Conclusion: Wilderness designation would preclude harvest of 100,682 cords of firewood and 1,976 Mbf of sawtimber. This represents about 2 percent of the firewood and substantially less than 1 percent of the total sawtimber in the RGRA and nearby national forest land.*

##### *Impacts on Wildlife Habitat and Population*

Under this alternative, wildlife habitat would be protected and current estimated populations of 160 mule deer and 135 bighorn sheep would be unchanged. In comparison, there are an estimated 7,000 mule deer and 300 bighorn sheep in the RGRA.

R 78 W

R 77 W



1 0 1 2 3 MILES



## CHAPTER 4. ENVIRONMENTAL CONSEQUENCES

The five spring developments described in Chapter 2 (Wildlife Habitat Management) would be constructed. However, these springs are not expected to increase wildlife populations.

Since no other projects are proposed, wildlife habitat would neither be improved nor disturbed. Therefore, under wilderness designation, habitat and populations would remain at or near the present level and condition.

*Conclusion: Wildlife habitat would be protected and current populations of approximately 160 mule deer and 135 bighorn sheep would be unchanged.*

### *Impacts on Recreation Use*

Under wilderness designation, hiking, backpacking, and hunting would remain at 25 annual recreation days and would occur north of Spring Gulch in a wilderness setting. There are no planned projects that would affect recreation use in this WSA.

*Conclusion: The existing 25 annual recreation days would be maintained and would occur in a wilderness setting.*

### ALTERNATIVE B - NO WILDERNESS DESIGNATION

Acres recommended for designation	0
Total acres in wilderness study area (WSA)	6,614

### *Impacts on Wilderness Values*

The wilderness values in the entire WSA would not be protected by wilderness designation.

The five spring developments proposed as wildlife projects would have almost no impact on the wilderness values because of their small size and the short time (2 to 3 days) needed to develop each spring.

The planned harvest and thinning of woodlands (pinon and juniper) and PFL (ponderosa pine and Douglas-fir) and associated access would disturb primarily the vegetation on a total of approximately 3,975 acres. The forestry projects would be done in more rolling terrain north of Spring Gulch. Naturalness would be lost on this land for about 60 to 80 years. The noise impacts would result in loss of opportunities for solitude and primitive and unconfined recreation on the same 3,975 acres on which the projects would occur, plus an additional 200 acres just south of Spring Gulch during the time of operation.

*Conclusion: Of the 6,614 acres not recommended for designation, wilderness values would be lost for the long term on approximately 4,000 acres and for the short term on an additional 200 acres. Although long-term protection would not be provided under this alternative, the remaining 2,414 acres would probably remain undisturbed in the foreseeable future and retain their wilderness values.*

### *Impacts on Locatable Mineral Exploration and Development*

Under this alternative, the entire 6,614 acres would continue to be available for exploration and development of locatable minerals. However, since the mineral potential for the entire WSA is considered low and there are only nine mining claims (approximately 180 acres), mineral exploration or development is not expected. Because of the small size and distance from a processing facility, the small perlite deposit on the east side of Ruby Mountain is not expected to be developed.

*Conclusion: The entire WSA would remain open to mineral entry; however, exploration or development is not expected. There would be no significant impacts because of the low development potential for all minerals.*

### *Impacts on Timber Production*

About 100,682 cords of pinon and juniper would be harvested on the total 3,910 operable acres of woodlands in the WSA as timber production projects. These projects would take place north of Spring Gulch.

In comparison there are 590,100 cords of firewood (over 160-year rotation age) on 63,460 operable acres of woodlands in the Royal Gorge Resource Area (RGRA). The nearby Pike-San Isabel National Forest plans to harvest about 4,905,000 cords of firewood over the next 160 years. The harvest of 100,682 cords of firewood in the WSA is about 18 percent of the potential harvest in the RGRA and about 2 percent of the total potential harvest in the RGRA and nearby national forest land combined.

The 1,976 Mbf of ponderosa pine and Douglas-fir on 65 operable acres of PFL in this WSA would be harvested over rotation age of 120 years. Harvest would occur south of Cottonwood Creek.

In comparison, there are 240,300 Mbf (over 120-year rotation age) on 41,000 operable acres of PFL in the RGRA. The nearby Pike-San Isabel National Forest plans to harvest approximately 5,875,000 Mbf of sawtimber over the next 120 years. The planned harvest of 1,976 Mbf of sawtimber in the WSA is about 1 percent of the potential harvest

## McINTYRE HILLS WSA

in the RGRA and substantially less than 1 percent of the potential harvest on the combined RGRA and nearby national forest land.

*Conclusion: About 100,682 cords of firewood and 1,976 Mbf of sawtimber in this WSA would be produced. This represents about 2 percent of the firewood and substantially less than 1 percent of the sawtimber in the RGRA and nearby national forest land.*

### Impacts on Wildlife Habitat and Population

Five spring developments would be constructed approximately one-half mile east of the Arkansas River in Green Gulch; near the eastern boundary of the WSA in Spring Gulch; approximately three-quarters of a mile from the eastern boundary of the WSA along Cottonwood Creek; just east of the Arkansas River approximately one-quarter mile north of Cottonwood Creek; and approximately one-quarter mile east of the river along Middle Cottonwood Creek. These springs would not be expected to affect wildlife populations. However, harvest of 3,910 acres of woodlands and 65 acres of PFL would improve wildlife habitat; therefore, mule deer populations would increase from 160 to about 180 and bighorn sheep would increase from 135 to about 140 animals. In comparison, there are an estimated 7,000 mule deer and 300 bighorn sheep in the RGRA.

Wildlife within the WSA would be minimally displaced as a result of disturbance associated with the access roads for the forestry projects. Since the total 5 miles of road would be closed and revegetated following completion of the projects, wildlife populations are not expected to decrease.

*Conclusion: Wildlife populations would increase by 20 mule deer and 5 bighorn sheep. This would be a 13 percent increase of mule deer in the WSA and substantially less than 1 percent in the RGRA. Bighorn sheep would increase by about 4 percent in the WSA and about 2 percent in the RGRA.*

### Impacts on Recreation Use

Existing use levels of about 25 annual recreation days of hiking, backpacking, and hunting would continue in a predominantly primitive back-country setting.

The planned timber projects would not be expected to impact the amount of recreation use in the WSA. However, the harvest of 3,910 operable acres of woodlands, which would occur north of Spring Gulch, could impact the location where some of the use occurs. It is expected that approximately 12 of the existing 25 annual recreation days would be displaced to areas south of Spring Gulch in some of the drainages and primitive areas. The total of 3.5 miles of

access roads to be constructed for the timber projects would be closed to the public; therefore, there would be no impacts to back-country vehicle use. Also, since the wildlife spring developments would not result in increased wildlife populations, there would be no increase in hunting use.

*Conclusion: The existing 25 annual recreation days would be maintained in a predominantly primitive back-country setting. About 12 annual recreation days would shift to the portion of the WSA south of Spring Gulch.*

## McINTYRE Hills (013)

### PROPOSED ACTION—ALTERNATIVE B - NO WILDERNESS DESIGNATION

Acres recommended for designation (Map 4-2)	0
Total acres in wilderness study area (WSA)	16,800

### Impacts on Wilderness Values

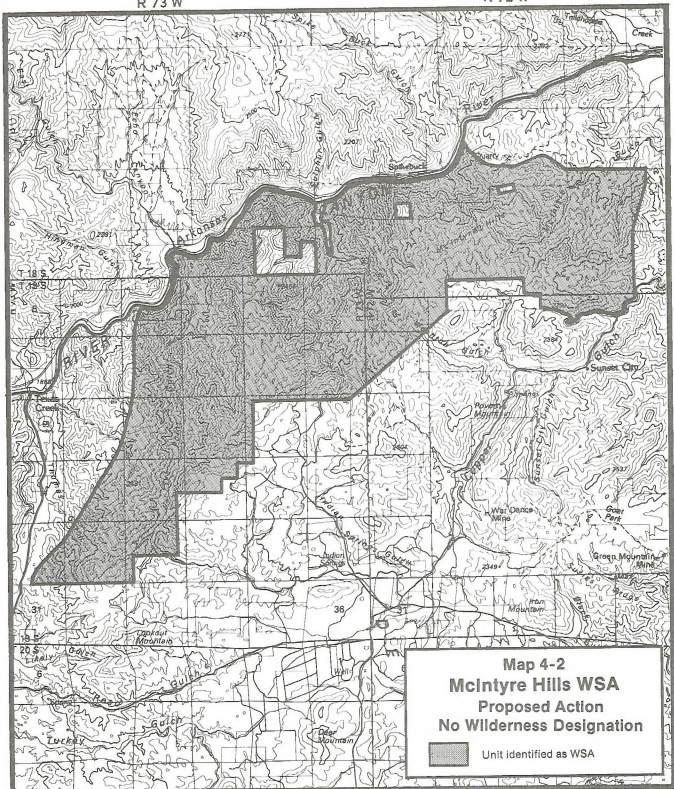
The wilderness values in the entire WSA would not be protected by wilderness designation.

The planned harvest and thinning of woodlands (pinon and juniper) and productive forest land (ponderosa pine and Douglas-fir) and associated access, proposed as timber projects, would disturb primarily the vegetation on a total of approximately 1,800 acres. These projects would be done in more rolling terrain along the southern WSA boundary between Five Points Gulch and McIntyre Gulch. Naturalness would be lost on this land for about 60 to 80 years. The noise impacts would result in loss of opportunities for solitude and primitive and unconfined recreation on the same 1,800 acres on which the projects would occur, plus an additional 800 acres surrounding the projects during the time of operation.

The three water catchments and associated access proposed as a wildlife habitat project would disturb approximately 5 acres. These projects are expected to be located near the northern WSA boundary east of McIntyre Gulch, near the northern WSA boundary west of Sheep Basin, and near the northern WSA boundary east of Five Points Gulch. Naturalness would be lost on this land. There would be a loss of solitude and primitive and unconfined recreation on approximately 5 additional acres surrounding each project only during construction. However, construction time of only 12 days per catchment is expected.

R 73 W

R 72 W



1 0 1 2 3 MILES

## McINTYRE HILLS WSA

The oakbrush burn, proposed as a wildlife habitat project, would disturb the vegetation on about 100 acres along the southern WSA boundary. No road construction would be necessary. This 100 acres would be black for approximately 9 months after the burn; however, new vegetation would then cover the area. As a result, naturalness would be lost on this land for about 9 months following the burn.

*Conclusion: Of the 16,800 acres not recommended for designation, wilderness values would be lost for the long term on approximately 1,800 acres and for the short term on an additional 900 acres. Although long-term protection would not be provided under this alternative, the remaining 14,100 acres would probably remain undisturbed in the foreseeable future and retain their wilderness values.*

### *Impacts on Locatable Mineral Exploration and Development*

Under this alternative, the entire 16,800 acres would continue to be available for exploration and development of locatable minerals. However, since the mineral potential for the entire WSA is considered low and there are only 25 mining claims (approximately 500 acres), mineral exploration or development is not expected.

*Conclusion: The entire WSA would remain open to mineral entry; however, exploration or development is not expected. There would be no significant impacts because of the low development potential for all minerals.*

### *Impacts on Forage Production and Livestock Management*

A planned pinon-juniper thinning project totaling 1,120 acres is within the 1,190 operable acres, which are planned for harvest as a timber production project. As a result of this harvest, allocated AUMs are expected to increase from 700 to 780 within 5 to 10 years after completion and would be maintained at that level thereafter. This project would improve the forage condition on these 1,120 acres from the naturally occurring poor condition to good.

Vegetation manipulation projects and associated road development projects would result in some short-term loss of AUMs. This impact would be offset by a long-term increase of 80 AUMs.

*Conclusion: Range improvement projects would result in an additional 80 allocated AUMs, which is an 11 percent increase.*

### *Impacts on Timber Production*

About 35,105 cords of pinon and juniper would be harvested on the total 1,190 operable acres of woodlands in the WSA as timber production projects.

In comparison there are 590,100 cords of firewood (over 160-year rotation age) on 63,460 operable acres of woodlands in the Royal Gorge Resource Area (RGRA). The nearby Pike-San Isabel National Forest plans to harvest about 4,905,000 cords of firewood over the next 160 years. The harvest of 35,105 cords of firewood in the WSA is about 6 percent of the potential harvest in the RGRA and about 1 percent of the total potential harvest on the RGRA and nearby national forest land combined.

The 6,977 Mbf of ponderosa pine and Douglas-fir on 571 operable acres of productive forest land (PFL) in this WSA would be harvested over rotation age of 120 years.

In comparison, there are 240,300 Mbf (over 120-year rotation age) on 41,000 operable acres of PFL in the RGRA. The nearby Pike-San Isabel National Forest plans to harvest approximately 5,875,000 Mbf of sawtimber over the next 120 years. The planned harvest of 6,977 Mbf of sawtimber over 120-year rotation age in this WSA is about 3 percent of the potential harvest in the RGRA and substantially less than 1 percent of the potential harvest on the combined RGRA and nearby national forest land.

All the harvesting for timber production projects would occur on parcels located along the southern WSA boundary between Five Points Gulch and McIntyre Gulch.

Since projects and associated road development for wildlife projects would not occur in the previously identified operable acres of woodlands or PFL, timber production would not be adversely affected.

*Conclusion: About 35,105 cords of firewood and 6,977 Mbf of sawtimber in this WSA would be produced. This represents about 1 percent of the firewood and substantially less than 1 percent of the sawtimber in the RGRA and nearby national forest land.*

### *Impacts on Wildlife Habitat and Population*

Completion of several projects are expected to result in estimated increases in mule deer from 400 to 490, bighorn sheep from 50 to 65, and turkey from 100 to 125. Specifically these projects include three water catchments, which would increase mule deer by 25; a 100-acre oakbrush burn, which would increase mule deer by 15; and a forestry harvest project, which would increase mule deer by 50, bighorn sheep by 15, and turkey by 25. In comparison, total wildlife populations in the RGRA are estimated at 7,000 mule deer, 300 bighorn sheep, and 1,200 turkey.



## CHAPTER 4. ENVIRONMENTAL CONSEQUENCES

It is expected the three water catchments would be constructed in the following locations: near the northern WSA boundary east of McIntyre Gulch; near the northern WSA boundary west of Sheep Basin; and near the northern WSA boundary east of Five Points Gulch. Although the exact location of this burn is not known, it is presumed that it would be located on relatively level to gently sloping terrain along the southern WSA boundary.

As a result of disturbance associated with access roads for forestry and wildlife projects, wildlife within the WSA would be minimally displaced. However, since the total 3 miles of road would be closed to the public during actual project development, and they would remain closed following completion of the projects, wildlife populations are not expected to decrease. These projects would be scattered throughout the WSA and the total area of disturbance from the roads providing access to the projects would be less than 4.5 acres.

*Conclusion: Wildlife habitat would improve and populations would increase by 90 mule deer, 15 bighorn sheep, and 25 turkey. This would be a 23 percent increase of mule deer in the WSA and 1 percent in the RGRA. Bighorn sheep would increase by 30 percent in the WSA and 5 percent in the RGRA and turkey would increase by 25 percent in the WSA and 2 percent in the RGRA.*

### *Impacts on Recreation Use*

Existing use levels of about 30 annual recreation days for hiking and backpacking would continue. About 70 percent of these uses occur in Sheep Basin and Five Points Gulch. Projects that would improve wildlife habitat and increase populations would result in the existing 15 annual hunter days increasing to 25. This use would continue to be dispersed throughout the WSA. Back-country vehicle use of 60 annual recreation days would be maintained and continue to be limited to existing ways and trails in Washtub Gulch along the southern WSA boundary, in the southern portion of Five Points Gulch, and the northern portion of Sheep Basin. The total existing 105 annual recreation days would be expected to increase to 115 in this alternative. This would occur in a predominantly primitive back-country setting.

The timber and wildlife projects and associated access would occur in areas receiving little recreation use. Therefore, it is not expected that recreation use would be affected by these projects. The total 3 miles of access roads to be constructed for these projects would be closed to the public and, therefore, there would be no impacts to existing back-country vehicle use.

*Conclusion: An additional annual 10 recreation days, which is a 10 percent increase, would be expected. All recreation use would occur in a predominantly primitive back-country setting.*

## ALTERNATIVE A - ALL WILDERNESS DESIGNATION

Acres recommended for designation	16,800
Total acres in wilderness study area (WSA)	16,800

### *Impacts on Wilderness Values*

Wilderness designation of the 16,800 acres recommended suitable would protect wilderness values on the entire WSA. The outstanding opportunities for solitude in drainages and gulches, such as Five Points Gulch and Sheep Basin, and other remote areas of the WSA would be protected.

Since no mineral exploration nor development is projected on any of the 25 mining claims and the firewood and sawtimber harvest and wildlife projects would not occur, wilderness values would be expected to be preserved in the entire WSA.

*Conclusion: Wilderness values would be preserved on the entire WSA and given long-term protection.*

### *Impacts on Locatable Mineral Exploration and Development*

Under this alternative, the entire 16,800 acres in the WSA would be withdrawn from mineral entry except for those mining claims with proven valid existing rights prior to designation.

Mineral development could still occur on the existing 25 claims (approximately 500 acres), if proven valid. However, since mineral potential for the entire WSA is considered low, no valid rights are anticipated and mineral exploration or development is not expected. The withdrawal would not cause significant adverse effects to mineral exploration and development because the development potential for all minerals is low.

*Conclusion: The entire 16,800 acres would be withdrawn from mineral entry and exploration with the exception of up to approximately 500 acres dependent on the validity of 25 existing mining claims. There would be no significant impacts because of the low development potential for all minerals.*

## LOWER GRAPE CREEK WSA

### *Impacts on Forage Production and Livestock Management*

The 1,120-acre thinning would not occur; therefore, the existing 700 AUMs would remain at the present level.

*Conclusion: The current 700 AUMs would be maintained.*

### *Impacts on Timber Production*

Under this alternative, approximately 35,105 cords of pinon and juniper, over 160-year rotation age, would not be harvested on 1,190 operable acres of woodlands in the WSA as timber production projects.

In comparison there are 63,460 operable acres of woodlands with 590,100 cords of firewood (over 160-year rotation age) in the RGRA. The nearby Pike-San Isabel National Forest plans to harvest about 4,905,000 cords of firewood over the next 160 years. A harvest of 35,105 cords of firewood in the WSA would be about 6 percent of the potential harvest in the RGRA and about 1 percent of the total potential harvest in the RGRA and nearby national forest land combined.

The potential 6,977 Mbf of ponderosa pine and Douglas-fir on 571 operable acres of PFL would not be harvested over the 120-year rotation age under this alternative.

In comparison there are 240,300 Mbf (over 120-year rotation age) on 41,000 operable acres of PFL in the RGRA. The nearby Pike-San Isabel National Forest plans to harvest approximately 5,875,000 Mbf of sawtimber over the next 120 years. The planned harvest of 6,977 Mbf of sawtimber in this WSA would be about 3 percent of the total potential harvest in the RGRA and substantially less than 1 percent of the potential harvest on the combined RGRA and nearby national forest land.

*Conclusion: Wilderness designation would preclude harvest of 35,105 cords of firewood and 6,977 Mbf of sawtimber. This represents about 1 percent of the firewood and substantially less than 1 percent of the sawtimber in the RGRA and nearby national forest land.*

### *Impacts on Wildlife Habitat and Population*

Since there are no projects planned, wildlife habitat would neither be improved nor disturbed and would remain at or near the present level and condition under wilderness designation.

Current estimated populations of 400 mule deer, 50 bighorn sheep, and 100 turkey would be unchanged. These numbers compare with estimated resource area totals of 7,000 mule deer, 300 bighorn sheep, and 1,200 turkey.

*Conclusion: Wildlife habitat would be protected and current populations of approximately 400 mule deer, 50 bighorn sheep, and 100 turkey would be unchanged.*

### *Impacts on Recreation Use*

Under wilderness designation, hiking and backpacking use would remain at 30 annual recreation days. About 70 percent of these uses would continue to occur in Sheep Basin and Five Points Gulch. Because of restrictions on back-country vehicle travel, hunting use would decrease from 15 to 10 annual hunter days, which would continue to be dispersed throughout the WSA, and the 60 annual back-country vehicle days would not occur.

Total existing 105 annual recreation days would be expected to decrease to 40 in this alternative. This use would occur in a wilderness setting.

*Conclusion: Elimination of back-country vehicle use would result in a decrease of 65 annual recreation days, which is a reduction of 62 percent of existing use. All recreation use would occur in a wilderness setting.*

## LOWER GRAPE CREEK (014)

### PROPOSED ACTION—ALTERNATIVE B - NO WILDERNESS DESIGNATION

Acres recommended for designation (Map 4-3)	0
Total acres in the wilderness study area (WSA)	11,220

### *Impacts on Wilderness Values*

The wilderness values in the entire WSA would not be protected by wilderness designation.

As in all the alternatives, the mine on the west side of Horseshoe Mountain described in the scenario in Chapter 2, Mineral Resource Management, would disturb approximately 20 acres. Naturalness would be lost on these acres. Because of visual and noise impacts, opportunities for solitude and primitive and unconfined recreation would be lost on about 1,000 additional acres of rugged terrain around the mine and access road only during the time the mine is in operation.

Mineral exploration would probably occur on between 1 and 10 sites in the rugged pinon-juniper covered area between Horseshoe Mountain and the Green Mountain Mine where



R 72 W

R 71 W

T 18 S

T 19 S

T 20 S

**Map 4-3**  
**Lower Grape Creek WSA**  
**Proposed Action**  
**No Wilderness Designation**



Unit Identified as WSA

1 0 1 2 3 MILES

## LOWER GRAPE CREEK WSA

there is moderate potential for base and precious metals. It is expected that each exploration site would disturb less than one-quarter acre. A total of up to 4 acres of surface disturbance would occur as a result of construction of minor access roads to the exploration sites. Naturalness would be lost on these acres. Solitude and primitive and unconfined recreation would be lost on about 5 additional acres of the land surrounding each of these operations only during exploration activity.

The two spring developments proposed as a livestock grazing project would have almost no impact on the wilderness values because of their small size and the short time (2 to 3 days) needed to develop each spring.

The three water catchments and associated access proposed as a wildlife habitat project located approximately 1 mile east of Scrapping Ridges, approximately one-half mile south of the junction of Pine Gulch and Grape Creek, and approximately 1 mile southeast of Horseshoe Mountain, would disturb about 5 acres. Naturalness would be lost on this land. There would be a loss of solitude and primitive and unconfined recreation on approximately 5 additional acres surrounding each project only during construction. However, construction time of only 12 days per catchment is expected.

The planned harvest and thinning of woodlands (pinon and juniper) and productive forest land (ponderosa pine and Douglas-fir) and associated access, proposed as timber and wildlife habitat projects, would disturb primarily the vegetation on a total of approximately 2,800 acres. The forestry projects would be done in more rolling, upland terrain along the eastern WSA boundary south of Horseshoe Mountain; north of Horseshoe Mountain; along the northern WSA boundary near Marsh Gulch; south of Marsh Gulch along the western WSA boundary; and southwest of Upper Goat Park Gulch. Naturalness would be lost on this land for about 60 to 80 years. The noise impacts would result in loss of opportunities for solitude and primitive and unconfined recreation on the same 2,800 acres on which the projects would occur plus an additional 1,000 acres surrounding the projects during the time of operation.

Planned aquatic habitat improvement projects would be designed to blend in with the natural environment and would, therefore, not impact wilderness. However, solitude would be temporarily disturbed in the immediate area during the 1-week length of the project development.

*Conclusion: Of the 11,220 acres not recommended for designation, wilderness values would be lost for the long term on approximately 2,800 acres and the short term on an additional 2,000 acres. Although long-term protection would not be provided under this alternative, the remaining 6,420 acres would probably remain*

*undisturbed in the foreseeable future and retain their wilderness values.*

### *Impacts on Locatable Mineral Exploration and Development*

Under this alternative, 11,220 acres would continue to be available for exploration and development of locatable minerals. Of this, approximately 2,000 acres between Horseshoe Mountain and the Green Mountain Mine are estimated to have moderate mineral potential for base and precious metals and approximately 9,220 acres in the rest of the WSA are estimated to have low potential for discovery of mineral deposits.

Potential exists for extracting and processing known mineral deposits on 156 claims (approximately 3,120 acres) in the WSA when the economic conditions are conducive to these activities. The known mineral deposits in the area are considered to have low to moderate potential for economic development at this time. Since there is a high concentration of claims on the western side of Horseshoe Mountain, it is assumed that one mine would be developed in this area resulting in production of an unknown amount of silver and the associated by-products of copper and lead.

The remaining 8,100 acres, which currently have no mining claims, would remain open to further exploration; however, based on the low to moderate potential for economic development, no additional discovery or production is anticipated in the foreseeable future.

*Conclusion: The entire WSA would remain open to mineral entry. Production of an unknown amount of silver and the associated by-products of copper and lead is projected from one small mine on the western side of Horseshoe Mountain.*

### *Impacts on Forage Production and Livestock Management*

Planned pinon-juniper thinning projects totaling 1,160 acres are within 1,910 operable acres planned for harvest as a timber production project. As a result of this harvest, allocated AUMs are expected to increase from 231 to 291 within 5 to 10 years after completion and would be maintained at that level thereafter. This project would improve the natural range condition on these 1,160 acres from poor to good.

Two spring developments would also be constructed; one near the southern WSA boundary at the beginning of Goat Park Gulch and the second close to the western WSA boundary near the beginning of Sawmill Gulch. Both would provide livestock water to other areas where no livestock water previously existed. This would result in better distribution of livestock.

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Because the rugged terrain and lack of existing forage currently limits grazing on the western side of Horseshoe Mountain, no impact to livestock grazing would occur if a mine were developed.

Since projects and associated road development for timber or wildlife projects would be scattered throughout the WSA and little surface disturbance would occur, forage production and livestock management would not be adversely affected.

*Conclusion: Range improvement projects would result in an additional 60 allocated AUMs, which is a 26 percent increase. Also, livestock distribution would be expected to improve.*

### *Impacts on Timber Production*

About 43,930 cords of pinon and juniper would be harvested on the total 1,910 operable acres of woodlands in the WSA as timber production projects. Also approximately 8,000 cords of pinon and juniper would be harvested as a result of the 500-acre pinon-juniper clearcut to be completed as a wildlife habitat improvement project described in Chapter 2 (Wildlife Habitat Management). A combined total of approximately 51,930 cords would be harvested from both timber and wildlife projects.

In comparison there are 590,100 cords of firewood (over 160-year rotation age) on 63,460 operable acres of woodlands in the Royal Gorge Resource Area (RGRA). The nearby Pike-San Isabel National Forest plans to harvest about 4,905,000 cords of firewood over the next 160 years. The harvest of 51,930 cords of firewood in the WSA would be about 9 percent of the potential harvest in the RGRA and about 1 percent of the total potential harvest in the RGRA and nearby national forest land combined.

The 8,558 Mbf of ponderosa pine and Douglas-fir on 389 operable acres of productive forest land (PFL) in this WSA would be harvested over rotation age of 120 years.

In comparison, there are 240,300 Mbf (over 120-year rotation age) on 41,000 operable acres of PFL in the RGRA. The nearby Pike-San Isabel National Forest plans to harvest approximately 5,875,000 Mbf of sawtimber over the next 120 years. The planned harvest of 8,558 Mbf of sawtimber over 120-year rotation age in this WSA is about 4 percent of the potential harvest in the RGRA and substantially less than 1 percent of the potential harvest on the combined RGRA and nearby national forest land.

All the harvesting for firewood and sawtimber production projects would occur on parcels located along the eastern WSA boundary south of Horseshoe Mountain; north of Horseshoe Mountain; along the northern WSA boundary near Marsh Gulch; south of Marsh Gulch along the western WSA boundary; and southwest of Upper Goat Park Gulch.

Development of a mine on the western side of Horseshoe Mountain would have no impact on timber production since the planned harvest areas are not close to the possible mine site and since few trees are on the mine site itself.

Since projects and associated road development for wildlife projects would not occur in the previously identified operable acres of woodlands or PFL, timber production would not be adversely affected.

*Conclusion: About 51,930 cords of firewood and 8,558 Mbf of sawtimber in this WSA would be produced. This represents about 1 percent of the firewood and substantially less than 1 percent of the sawtimber in the RGRA and nearby national forest land.*

### *Impacts on Wildlife Habitat and Population*

#### *Terrestrial*

Installation of three water catchments are expected to result in estimated increases in mule deer from 280 to 300, bighorn sheep from 28 to 33, and turkey from 100 to 140. These catchments would be located approximately 1 mile east of Scrapping Ridges; approximately one-half mile south of the junction of Pine Gulch and Grape Creek; and approximately 1 mile southeast of Horseshoe Mountain. It is estimated that mule deer and bighorn sheep would also increase by 50 and 5 respectively as a result of a 500-acre pinon-juniper clearcut project located approximately one-third mile east of Sunset City Gulch. It is also estimated that mule deer would increase by 50 as a result of a forestry harvest of sawtimber and firewood.

In comparison, total wildlife populations in the RGRA are estimated at 7,000 mule deer, 300 bighorn sheep, and 1,200 turkey.

As a result of disturbance associated with the mine development, (described in Chapter 2); mining exploration; and access roads for forestry and wildlife projects; wildlife within the WSA would be minimally displaced. However, since the total 13 miles of road would be closed to the public during actual project development, and they would remain closed following completion of the projects, wildlife populations are not expected to decrease. These projects would be scattered throughout the WSA and the total area of disturbance from the mine and roads providing access to the other projects would be less than 40 acres.

*Conclusion: Wildlife habitat and species distribution would improve and populations would increase by 120 mule deer, 10 bighorn sheep, and 40 turkey. This would be a 43 percent increase of mule deer in the WSA and 2 percent in the RGRA. Bighorn sheep would increase by 36 percent in the WSA and 3*

## LOWER GRAPE CREEK WSA

percent in the RGRA and turkey would increase by 40 percent in the WSA and 3 percent in the RGRA.

### *Aquatic*

Neither the mine development described in Chapter 2; projected mineral exploration activities; nor forestry, range, and terrestrial wildlife projects would affect the aquatic habitat within the WSA since all of these activities occur outside the watershed influence of Grape Creek.

Spring development projects to better distribute livestock would stabilize the riparian area along Grape Creek and help maintain the existing populations. These springs would be developed near the southern WSA boundary at the beginning of Goat Park Gulch and close to the western WSA boundary near the beginning of Sawmill Gulch. The gap fencing recently installed on the west side of Grape Creek is reversing the declining condition of the riparian habitat by excluding livestock grazing. The proposed placement of rock gabions in Lower Grape Creek approximately 200 yards north of the junction of Bear Gulch and Grape Creek would create a favorable pool/riffle ratio for game fish. The combination of these improvement activities is expected to lead to a 50-pound per acre increase in game fish and corresponding decrease in nongame fish.

*Conclusion: Existing riparian habitat along Grape Creek would improve and game fish in Grape Creek would increase by 500 percent or 50 pounds per acre and nongame fish would decrease by 56 percent or 50 pounds per acre.*

### *Impacts on Recreation Use*

Existing use levels of about 100 annual recreation days for hiking and backpacking would continue. About 90 percent of these uses occur along the Grape Creek corridor. A stream improvement project and increase of pounds per acre of game fish would result in an increase of annual angler days from 125 to 145. All of this use occurs along the Grape Creek corridor. In addition, projects that would improve wildlife habitat and increase populations would result in the existing 25 annual hunter days increasing to 40. This use would continue to be dispersed throughout the WSA. Back-country vehicle use of 100 annual recreation days would be maintained and continue to be limited to existing ways and trails around the western perimeter of the WSA.

The total existing 350 annual recreation days would be expected to increase to 385 in this alternative. This would occur in a predominantly primitive back-country setting.

Recreation use levels would not be affected by the mine development or exploration described in the scenario in Chapter 2 since it would occur in areas generally not receiving recreation use. The range and wildlife projects

and associated access would be scattered throughout the WSA and would be in areas receiving little recreation use. The total 13 miles of access roads to be constructed for these projects would be closed to the public and, therefore, there would be no impacts to existing back-country vehicle use.

*Conclusion: An additional annual 35 recreation days, which is a 10 percent increase, is expected. All recreation use would occur in a predominantly primitive back-country setting.*

## ALTERNATIVE A - ALL WILDERNESS DESIGNATION

Acres recommended for designation	11,220
Total acres in the wilderness study area (WSA)	11,220

### *Impacts on Wilderness Values*

Wilderness designation of the 11,220 acres recommended suitable would protect wilderness values on approximately 10,200 acres of the WSA. Opportunities for solitude in the canyon along Grape Creek, in many of the drainages, and in the many remote areas of this WSA would be protected.

Although the WSA would be designated wilderness under this alternative, the mine and associated access (described in Chapter 2, Minerals Resource Management) would probably still occur as a result of the existing mining claims. Since there is a concentration of claims on the western side of Horseshoe Mountain, it is expected that a mine, which would disturb approximately 20 acres, would be located in this area. Naturalness would be lost on these acres. Because of visual and noise impacts, opportunities for solitude and primitive and unconfined recreation would be lost on about 1,000 additional acres around the mine and access road only while the mine is in operation.

The entire WSA would be withdrawn from mineral entry, subject to valid existing rights. Mineral exploration and development could occur on the 156 claims (3,120 acres) if they were determined to have valid existing rights. However, it is assumed only those claims resulting in the projected mine would prove valid. No mineral exploration would be expected to occur under this alternative and as a result there would be no surface disturbing impacts.

Also the range, timber, and wildlife projects proposed under the no wilderness alternative would not occur.

*Conclusion: Of the 11,220 acres recommended for designation, wilderness values would be preserved on 10,200 acres and given long-term protection. Wilderness values are projected to be lost for*



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*the long term on approximately 20 acres and the short term on an additional 1,000 acres.*

### ***Impacts on Locatable Mineral Exploration and Development***

Under this alternative, the entire 11,220 acres in the WSA would be withdrawn from mineral entry except for those mining claims with proven valid existing rights prior to designation. Of the total acres in the WSA, approximately 2,000 acres between Horseshoe Mountain and the Green Mountain Mine are estimated to have moderate potential for base and precious metals and approximately 9,220 acres are estimated to have low potential for discovery of mineral deposits.

Mineral development could still occur on the existing 156 claims (approximately 3,120 acres), if proven valid. It is projected that development of one mine and subsequent production of an unknown amount of silver and the associated by-products of copper and lead would occur as in the no wilderness alternative. Future exploration would be precluded on the remaining 8,100 acres.

*Conclusion: The entire 11,220 acres in the WSA would be withdrawn from mineral entry and exploration with the exception of up to approximately 3,120 acres dependent on the validity of 156 existing mining claims. Production of an unknown amount of silver and the associated by-products of copper and lead is projected from one small mine on the western side of Horseshoe Mountain.*

### ***Impacts on Forage Production and Livestock Management***

Two spring developments would be constructed near the southern WSA boundary at the beginning of Goat Park Gulch and the second near the western WSA boundary close to the beginning of Sawmill Gulch. These would provide water to other areas where livestock water did not previously exist and would result in better distribution of livestock. No additional projects would be constructed; therefore, the existing 231 AUMs would remain at the present level. Also because the rugged terrain and lack of existing forage currently limits grazing in that area, no impact to livestock grazing would occur if the mine were developed.

*Conclusion: The current 231 AUMs would be maintained and livestock distribution would improve.*

### ***Impacts on Timber Production***

Under this alternative, approximately 43,930 cords of pinon and juniper, over 160-year rotation age, would not be harvested on 1,910 operable acres of woodlands in the WSA as a timber production project. Since a 500-acre pinon-juniper clearcut to be completed as a wildlife project described in Chapter 2 (Wildlife Habitat Management) would not occur under this alternative, the harvest of 8,000 cords of firewood would be precluded.

In comparison there are 63,460 operable acres of woodlands with 590,100 cords of firewood (over 160-year rotation age) in the RGRA. The nearby Pike-San Isabel National Forest plans to harvest about 4,905,000 cords of firewood over the next 160 years. A planned harvest of 51,930 cords of firewood in the WSA would be about 9 percent of the potential harvest in the RGRA and about 1 percent of the total potential harvest in the RGRA and nearby national forest land combined.

The potential 8,558 Mbf of ponderosa pine and Douglas-fir on 389 operable acres of PFL would not be harvested over 120-year rotation age under this alternative.

In comparison there are 240,300 Mbf (over 120-year rotation age) on 41,000 operable acres of PFL in the RGRA. The nearby Pike-San Isabel National Forest plans to harvest approximately 5,875,000 Mbf of sawtimber over the next 120 years. A planned harvest of 8,558 Mbf of sawtimber in this WSA would be about 4 percent of the total potential harvest in the RGRA and substantially less than 1 percent of the potential harvest on the combined RGRA and nearby national forest land.

*Conclusion: Wilderness designation would preclude harvest of 51,930 cords of firewood and 8,558 Mbf of sawtimber. This represents about 1 percent of the firewood and substantially less than 1 percent of the sawtimber in the RGRA and nearby national forest land.*

### ***Impacts on Wildlife Habitat and Population***

#### ***Terrestrial***

This alternative would preclude surface disturbing activities with the exception of impacts from the mine on the western side of Horseshoe Mountain described in the no wilderness alternative in Chapter 2. As a result of disturbance associated with the mine development, wildlife within the WSA would be minimally displaced. Since the total area of disturbance would only be 20 acres, changes in wildlife populations are not expected.

Current estimated populations of 280 mule deer, 28 bighorn sheep, and 100 turkey would be unchanged. These numbers

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compare with estimated resource area totals of 7,000 mule deer, 300 bighorn sheep, and 1,200 turkey.

*Conclusion: Wildlife habitat would be protected and current populations of approximately 280 mule deer, 28 bighorn sheep, and 100 turkey would be unchanged.*

### *Aquatic*

Wilderness designation would protect existing aquatic habitat; therefore, present fish populations would remain at approximately 100 pounds per acre and consist of approximately 90 percent nongame species and 10 percent game species.

Since the mine development described in Chapter 2 is not near Grape Creek and no mineral exploration is expected, no impacts to aquatic habitat are anticipated from these activities.

Spring development projects to better distribute livestock would stabilize the riparian area along Grape Creek and help maintain the existing populations. The gap fencing recently installed on the west side of Grape Creek is reversing the declining condition of the riparian habitat by excluding livestock grazing. However, these projects by themselves are not expected to increase game fish populations.

*Conclusion: Existing riparian habitat would be protected and current game fish populations in Grape Creek of approximately 10 pounds per acre and nongame fish populations of approximately 90 pounds per acre would be maintained.*

### *Impacts on Recreation Use*

Under wilderness designation, hiking and backpacking use would remain at 100 annual recreation days; fishing use would remain at 125 annual angler days. Because of restrictions on motorized vehicle travel, hunting use would decrease from 25 to 15 annual hunter days and the 100 annual back-country vehicle days would not occur. About 90 percent of the recreation use would continue to occur along Grape Creek, except hunting, which would continue to be dispersed throughout the WSA.

Total existing 350 annual recreation days would be expected to decrease to 240 in this alternative. This use would occur in a wilderness setting.

Since little recreation use is occurring in the area near the mine development or exploration described in the scenario in Chapter 2, no impacts would be expected to occur.

*Conclusion: Elimination of back-country vehicle use would result in a decrease of 110 annual recreation days, which is a reduction of 31 percent. All recreation use would occur in a wilderness setting.*

## ALTERNATIVE C - PARTIAL WILDERNESS DESIGNATION

Acres recommended for designation (Map 4-4)	7,300
Acres not recommended for designation	<u>3,920</u>
Total acres in the wilderness study area (WSA)	<u>11,220</u>

### *Impacts on Wilderness Values*

Wilderness designation of the 7,300 acres recommended as suitable would protect wilderness values on this portion of the WSA. The existing natural values of the WSA would not be disturbed. Outstanding opportunities for solitude in the canyon along Grape Creek, in many of the side canyons and drainages, and in the many remote and rugged areas of this WSA would be protected.

The entire 7,300 acres recommended for wilderness designation are subject to claims with valid existing rights. None of the 90 claims (approximately 1,800 acres) are expected to prove valid and, therefore, no exploration nor development would occur.

The range and timber projects within these 7,300 acres that would be completed under the no wilderness alternative would not occur. Therefore, protection of all wilderness values would continue in this area.

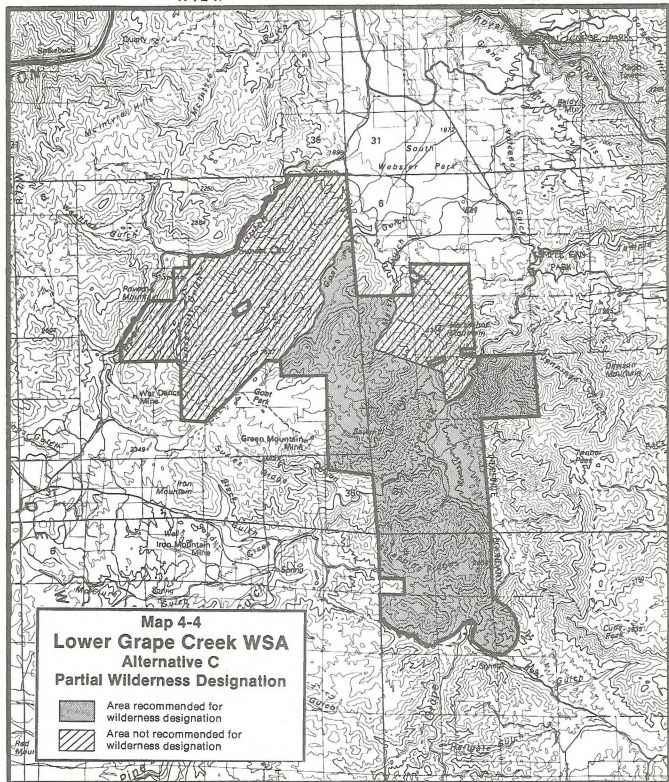
Wilderness values on the 3,920 acres not recommended as suitable would not be protected by wilderness designation. As in the other alternatives, the mine on the western side of Horseshoe Mountain described in Chapter 2, Mineral Resource Management, would disturb approximately 20 acres. Naturalness would be lost on these acres. Because of visual and noise impacts, opportunities for solitude and primitive and unconfined recreation would be lost on about 1,000 acres of rugged terrain around the mine and access road only during the time the mine is in operation.

Also in the portion not recommended, mineral exploration would probably occur on between 1 and 6 sites around Horseshoe Mountain since this is considered the area with moderate potential for base and precious metals. It is expected that each exploration site would disturb less than one-quarter acre. A total of up to 1.5 acres of surface disturbance would occur as a result of construction of minor access roads to the exploration sites. Naturalness would be lost on these acres. Solitude and primitive and unconfined recreation would be lost on about 5 acres of the lands



R 72 W

R 71 W



T 18 S

T 19 S

T 20 S



1 0 1 2 3 MILES

4-16

## LOWER GRAPE CREEK WSA

surrounding each of these operations only during exploration activity.

Also within the 3,920 acres not recommended, the planned harvest and thinning of woodlands and PFL and associated access, proposed as timber and wildlife habitat projects, would disturb a total of approximately 1,100 acres of the total 2,800 acres that would be lost under the no wilderness alternative. The forestry projects would be done in more rolling, upland terrain along the eastern WSA boundary south of Horseshoe Mountain; north of Horseshoe Mountain; along the northern WSA boundary near Marsh Gulch; south of Marsh Gulch along the western WSA boundary; and southwest of Upper Goat Park Gulch. The wildlife project would be approximately one-third mile east of Sunset City Gulch. Naturalness and visual quality would be lost on this land. Although 500 acres of the total 1,100 acres would be a thinning project only and the impact to visual qualities and naturalness would be less than the other areas to be harvested, this project would still be noticeable in the predominantly natural upland terrain of the WSA. The noise impacts would result in a loss of opportunities for solitude and primitive and unconfined recreation on the same 1,100 acres on which projects would occur plus an additional 500 acres around these projects only during the time of operation.

*Conclusion: Of the total 11,220 acres in this WSA, 7,300 acres would be designated wilderness and given long-term protection. Wilderness values are expected to be lost for the long term on approximately 1,200 acres and for the short term on an additional 1,500 acres. Although no long-term protection would be provided, wilderness values are expected to remain undisturbed on an additional 1,220 acres in the portion recommended unsuitable.*

### *Impacts on Locatable Mineral Exploration and Development*

Under this alternative, the 7,300 acres recommended for wilderness designation would be withdrawn from mineral entry except for those mining claims with proven valid existing rights prior to designation.

On the portion recommended for wilderness, mineral development could still occur on the existing 90 claims (approximately 1,800 acres) if they prove valid. Since the heaviest concentrations of mining claims are around the western side of Horseshoe Mountain and outside the recommended portion of the WSA, it is assumed that none of these claims would prove valid. Therefore, no further exploration nor development is expected on these 90 claims. Of the 7,300 acres recommended for designation, the remaining 5,500 acres not covered by mining claims would be closed to mineral exploration or development.

The 3,920 acres not recommended for wilderness would continue to be available for exploration and development of locatable minerals. Potential exists for extracting and processing the known mineral deposits on 66 claims (approximately 1,320 acres) when the economic conditions are conducive to these activities. Since there is a high concentration of claims around the western side of Horseshoe Mountain, it is assumed that one mine would be developed in this area resulting in the production of an unknown amount of silver and the associated by-products of copper and lead as in the other alternatives.

The following chart summarizes mineral exploration and development potential for this alternative.

Acres	Mineral Potential			Mining Claims	Mines Expected
	Low	Moderate	High		
7,300 (recommended suitable)	6,100 acres	1,200 acres	0	90 claims (approximately 1,800 acres)	None
3,920 (recommended unsuitable)	3,120 acres	800 acres	0	66 claims (approximately 1,320 acres)	1
11,220 (entire WSA)	9,220 acres	2,000 acres	0	156 claims (approximately 3,120 acres)	1

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*Conclusion: The 7,300 acres recommended for wilderness designation would be withdrawn from mineral entry subject to proven valid existing rights. Exploration and development could continue on the remaining 3,920 acres of land not recommended for wilderness designation. Production of an unknown amount of silver and the associated by-products of copper and lead is projected from the same small mine on the western side of Horseshoe Mountain, as in the no wilderness and all wilderness alternatives.*

### *Impacts on Forage Production and Livestock Management*

On the 7,300 acres recommended for wilderness, the two spring developments described in the no wilderness alternative would be constructed. These spring developments, one near the southern WSA boundary at the beginning of Goat Park Gulch and the second close to the western WSA boundary near the beginning of Sawmill Gulch, would distribute livestock use and allow grazing in areas that previously had no livestock water.

On the 3,920 acres not recommended for wilderness, a 500-acre planned pinon-juniper thinning (compared to a total of 1,160 total project acres, which would be thinned under the no wilderness alternative) would be completed as part of a timber resource project. This project would provide more forage; therefore, allocated AUMs are expected to increase from 231 to 264 within 5 to 10 years after completion and would be maintained at that level thereafter. The thinning would also improve the natural range condition on these 500 acres from poor to good.

Because rugged terrain and lack of existing forage currently limit grazing on the western side of Horseshoe Mountain, no impact would occur to livestock grazing if a mine were developed.

Since projects and associated road development from timber and wildlife projects would be scattered throughout this portion of the WSA and little surface disturbance would occur, forage production and livestock management would not be adversely affected.

*Conclusion: Range improvement projects would result in an additional 33 allocated AUMs, which is a 14 percent increase, and livestock distribution would improve.*

### *Impacts on Timber Production*

On the 7,300 acres recommended for wilderness, 32,430 cords of pinon-juniper firewood on 1,410 operable acres of woodlands would remain unharvested. About 6,292 Mbf of ponderosa pine and Douglas-fir sawtimber on 286 acres of operable PFL would also remain unharvested.

On the 3,920 acres not recommended for wilderness, about 11,500 cords of pinon-juniper firewood would be harvested on 500 operable acres of woodlands north of Horseshoe Mountain; along the northern WSA boundary near Marsh Gulch; and southwest of Upper Goat Park Gulch. Approximately 8,000 cords of pinon and juniper would also be harvested as a result of the 500-acre pinon-juniper clearcut to be completed as a wildlife habitat improvement project described in Chapter 2 (Wildlife Habitat Management). The combined total of approximately 19,500 cords would be harvested from both projects.

In comparison there are 590,100 cords of firewood (over 160-year rotation age) on 63,460 operable acres of woodlands in the RGRA. The nearby Pike-San Isabel National Forest plans to harvest about 4,905,000 cords of firewood over the next 160 years. The potential harvest of 19,500 cords of firewood in this WSA would be about 3 percent of the potential harvest in the RGRA and substantially less than 1 percent of the total potential harvest in the RGRA and nearby national forest land.

Also on the 3,920 acres not recommended for wilderness, 2,935 Mbf of ponderosa pine and Douglas-fir sawtimber on 103 operable acres of PFL would be harvested under this alternative, and would occur in locations southwest of Upper Goat Park Gulch.

In comparison there are 41,000 operable acres of PFL with 240,300 Mbf (over 120-year rotation age) in the RGRA. The nearby Pike-San Isabel National Forest plans to harvest approximately 5,875,000 Mbf of sawtimber over the next 120 years. The harvest of approximately 2,935 Mbf of sawtimber in this WSA is about 1 percent of the total potential harvest in the RGRA and substantially less than 1 percent of the potential harvest in the RGRA and nearby national forest land combined.

Mine development on the western side of Horseshoe Mountain would have no impact on firewood and sawtimber production since the planned harvest areas are not close to the possible mine site.

Range and wildlife projects and associated road development would not adversely impact firewood and sawtimber production since these projects would not occur on the previously identified operable acres of woodlands or PFL.

*Conclusion: About 19,500 cords of the total 51,930 cords of firewood in the WSA and 2,935 Mbf of the total 8,558 Mbf of sawtimber would be produced. This represents substantially less than 1 percent of the firewood and sawtimber in the RGRA and nearby national forest land.*

## LOWER GRAPE CREEK WSA

### *Impacts on Wildlife Habitat and Population*

#### *Terrestrial*

Since no surface disturbing activities would occur, the existing wildlife habitat on 7,300 acres would be protected by wilderness designation. Therefore, present populations of 182 mule deer, 18 bighorn sheep, and 65 turkey would be maintained.

On the 3,920 acres not recommended for wilderness designation, a 500-acre pinon-juniper manipulation project located approximately one-third mile east of Sunset City Gulch is expected to result in improved wildlife habitat. Therefore, it is expected that mule deer would increase from 98 to 148 animals and bighorn sheep from 10 to 15 animals; however, turkey populations in this portion of the WSA would remain at 35 birds. As a result of forestry projects, an additional increase of 55 mule deer would occur.

In comparison total wildlife populations in the RGRA are estimated at 7,000 mule deer, 300 bighorn sheep, and 1,200 turkey.

As a result of disturbance associated with mineral exploration and the mine development on the western side of Horseshoe Mountain (described in Chapter 2), as well as access roads for forestry and some wildlife projects, wildlife present within the portion not recommended for designation would be minimally displaced. It is expected that the total 6 miles of road would be closed to the public during actual project development, and they would remain closed following completion of the projects. These projects would be scattered throughout the WSA and the total area of disturbance from the mine and roads providing access to the other projects would be less than 40 acres. Therefore, wildlife populations would not be expected to decrease.

*Conclusion: Wildlife habitat would be protected on 7,300 acres recommended for wilderness and would be improved on portions of the remaining 3,920 acres not recommended. Increases in wildlife populations of 105 mule deer and 5 bighorn sheep would occur. This would be a 38 percent increase of mule deer in the WSA and 1 percent in the RGRA. Bighorn sheep would increase by 18 percent in the WSA and 2 percent in the RGRA.*

#### *Aquatic*

Since all of the existing aquatic habitat in this WSA is in the 7,300 acres recommended for wilderness designation, impacts would be the same as in the all wilderness alternative.

*Conclusion: Existing riparian habitat would be protected and current game fish populations of approximately 10 pounds per*

*acre and nongame fish populations of approximately 90 pounds per acre in Grape Creek would be maintained.*

### *Impacts on Recreation Use*

On the 7,300 acres recommended for wilderness designation, the annual 95 hiking and backpacking recreation days and the annual 125 angler days would be maintained. All of the fishing and approximately 75 percent of the hiking and backpacking would continue to occur along Grape Creek. Because of restricted back-country vehicle travel, annual hunter days, which would continue to be dispersed throughout the WSA, would decrease from approximately 17 to 12 and 80 annual back-country vehicle recreation days would not occur.

In this portion of the WSA, the total existing estimated 317 annual recreation days would be expected to decrease to about 232. This use would occur in a wilderness setting.

On the 3,920 acres not recommended for wilderness designation, approximately 5 annual recreation days of hiking and backpacking would continue. Since wildlife projects to improve mule deer and bighorn sheep habitat would occur, populations are expected to increase. Therefore, the existing 8 annual hunter days would increase to about 13. Existing back-country vehicle use of 20 annual recreation days would also continue on a number of dead-end spurs around the western perimeter of the WSA.

In this portion not recommended the total 33 annual recreation days would be expected to increase to 38. This use would occur in a predominantly primitive back-country setting.

Since development is not likely to occur in areas receiving recreation use, the projected mine described in the scenario in Chapter 2 and mineral exploration would not be expected to impact recreation use.

The range, timber, and wildlife projects and associated access are scattered throughout the WSA and would be in areas receiving little use; therefore, these projects are not expected to affect recreation use.

*Conclusion: Elimination of back-country vehicle use, in the portion recommended, would result in a decrease of 80 annual recreation days, which is a reduction of 23 percent from existing use. Recreation use would occur in a wilderness setting on the 7,300 acres recommended for wilderness designation and in a predominantly primitive back-country setting on the remaining 3,920 acres not recommended.*



## CHAPTER 4. ENVIRONMENTAL CONSEQUENCES

### BEAVER CREEK (016)

#### PROPOSED ACTION—ALTERNATIVE C - PARTIAL WILDERNESS DESIGNATION—I

Areas recommended for designation (Map 4-5)	20,750
Acres not recommended for designation	<u>5,400</u>
Total acres in wilderness study area (WSA)	26,150

#### *Impacts on Wilderness Values*

Wilderness designation of the 20,750 acres recommended as suitable would protect wilderness values on this portion of the WSA. Outstanding opportunities for solitude in the canyon along Beaver Creek, in West Mill Creek, Trail Gulch, many of the drainages, and remote areas of this WSA would be protected.

The entire 20,750 acres recommended for wilderness designation are subject to claims with valid existing rights. However, since this portion of the WSA has low mineral potential and currently has no mining claims, no exploration nor development is expected.

The timber projects within these 20,750 acres that would be completed under the no wilderness alternative would not occur. Therefore, protection of all wilderness values would continue.

Wilderness values on the 5,400 acres not recommended as suitable would not be protected by wilderness designation. The planned harvest of productive forest land (PFL) and associated access, proposed as timber projects, would disturb a total of approximately 120 acres of the total 177 acres that would be lost under the no wilderness alternative. The forestry projects would be done in more rolling terrain west of East Eightmile Creek and north of Little Turkey Creek along the extreme northeastern WSA boundary. The noise impacts would result in a loss of opportunities for solitude and primitive and unconfined recreation on the same 120 acres on which projects would occur plus an additional 200 acres around these projects only during the time of operation.

*Conclusion: Of the total 26,150 acres in this WSA, 20,750 acres would be designated wilderness and given long-term protection. Wilderness values are expected to be lost for the long term on approximately 120 acres and for the short term on an additional 200 acres. Although no long-term protection would be provided, wilderness values are expected to remain undisturbed on an additional 5,080 acres in the portion recommended unsuitable.*

#### *Impacts on Locatable Mineral Exploration and Development*

Under this alternative, the 20,750 acres recommended for wilderness designation would be withdrawn from mineral entry except for those mining claims with proven valid existing rights prior to designation. Currently there are no claims in this portion of the WSA. Because of the low mineral potential, and lack of existing claims, it is assumed there would be no valid existing rights prior to designation. Therefore, no exploration nor development is expected. The withdrawal would not cause significant adverse effects to mineral exploration and development because the development potential for all minerals is low.

The 5,400 acres, not recommended for wilderness designation, would continue to remain open for mineral entry. However, since the mineral potential for the entire WSA is considered low, and there are only four mining claims (approximately 80 acres), mineral exploration or development is not expected.

*Conclusion: The 20,750 acres recommended for wilderness designation would be withdrawn from mineral entry subject to proven valid existing rights. Exploration and development could continue on the remaining 5,400 acres not recommended for wilderness designation. Mineral exploration or development is not expected in either portion of this WSA. There would be no significant impacts because of the low development potential for all minerals.*

#### *Impacts on Timber Production*

On the 20,750 acres recommended for wilderness, 12,882 cords of pinon-juniper firewood on 493 operable acres of woodlands would remain unharvested. About 1,582 Mb of ponderosa pine and Douglas-fir sawtimber on 57 acres of operable PFL would also remain unharvested.

On the 5,400 acres not recommended for wilderness, there are no operable acres of woodlands. Also on the 5,400 acres not recommended for wilderness, 3,560 Mb of ponderosa pine and Douglas-fir sawtimber on 120 operable acres of PFL would be harvested under this alternative. Harvest would occur west of East Eightmile Creek and north of Little Turkey Creek along the extreme northeastern WSA boundary.

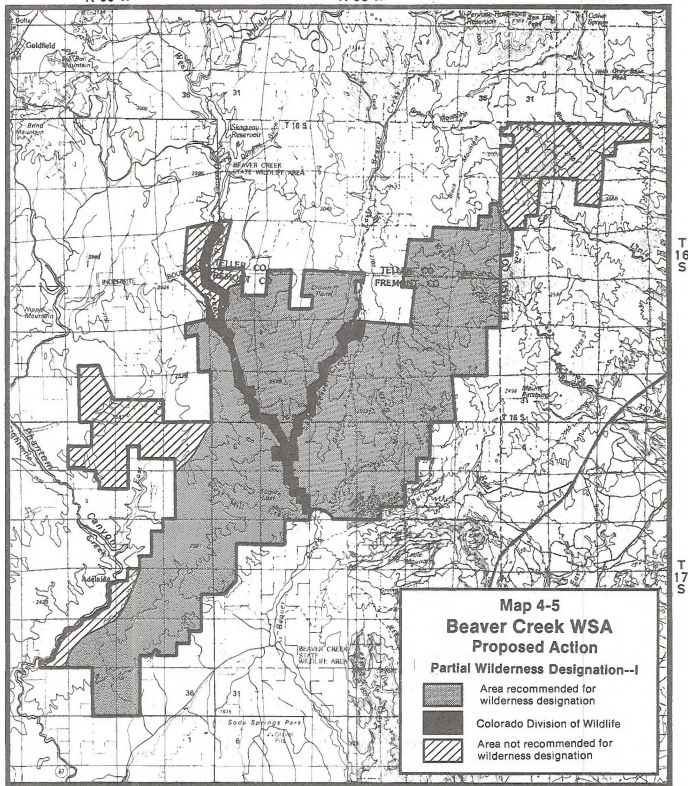
In comparison there are 590,100 cords of firewood (over 160-year rotation age) on 63,460 operable acres of woodlands in the RGRA. The nearby Pike-San Isabel National Forest plans to harvest about 4,905,000 cords of firewood over the next 160 years. There are 41,000 operable



R 69 W

R 68 W

R 67 W



T 16 S

T 17 S

1 0 1 2 3 4 MILES

## CHAPTER 4. ENVIRONMENTAL CONSEQUENCES

acres of PFL with 240,300 Mbf (over 120-year rotation age) in the RGRA. The nearby Pike-San Isabel National Forest plans to harvest approximately 5,875,000 Mbf of sawtimber over the next 120 years. The harvest of approximately 3,560 Mbf of sawtimber in this WSA is about 1 percent of the total potential harvest in the RGRA and substantially less than 1 percent of the potential harvest on the combined RGRA and nearby national forest land.

No other projects are planned that would impact timber production.

*Conclusion: Wilderness designation would preclude harvest of 12,882 cords of firewood; however, 3,560 Mbf of the total 5,142 Mbf of sawtimber would be produced. This represents substantially less than 1 percent of the sawtimber in the RGRA and nearby national forest land.*

### *Impacts on Wildlife Habitat and Population*

Since no surface disturbing activities would occur under wilderness designation, the existing wildlife habitat on the 20,750 acres recommended for wilderness would be protected.

On the 5,400 acres not recommended for wilderness designation, no activities are planned that would change the existing wildlife habitat. Since the forestry projects would take place on only 120 acres, wildlife habitat is not expected to be affected.

Since no wildlife projects are proposed in either portion of the WSA, existing populations of 650 mule deer, 50 bighorn sheep, and 225 turkey would be maintained. In comparison wildlife populations in the RGRA are estimated at 7,000 mule deer, 300 bighorn sheep, and 1,200 turkey.

*Conclusion: Existing wildlife habitat would be maintained on both the 20,750 acres recommended and the 5,400 acres not recommended for wilderness designation. Wildlife populations would remain at 650 mule deer, 50 bighorn sheep, and 225 turkey.*

### *Impacts on Recreation Use*

On the 20,750 acres recommended for wilderness designation, the 800 annual recreation days of hiking, backpacking, hunting, and fishing would be maintained. Although all the fishing would occur in Beaver Creek, about 95 percent of the hiking and backpacking would continue to occur in Trail Gulch, West Mill Creek, and along Beaver Creek. Hunting would be dispersed throughout the WSA. This use would occur in a wilderness setting.

On the 5,400 acres not recommended for wilderness designation, approximately 1,200 annual recreation days of hiking, car camping, and back-country vehicle use would continue. Back-country vehicle use in this portion of the WSA is mostly associated with the car camping that takes place. This use would occur along the western WSA boundary near Phantom Canyon in a predominantly primitive back-country setting. The timber projects described in Chapter 2 would occur in areas receiving little recreation use. These projects would not increase wildlife populations nor hunter days; therefore, recreation use would not be affected.

*Conclusion: The existing 2,000 annual recreation days would be maintained. Recreation use would occur in a wilderness setting on the 20,750 acres recommended for wilderness designation and in a predominantly primitive back-country setting on the remaining 5,400 acres not recommended.*

## ALTERNATIVE A - ALL WILDERNESS DESIGNATION

Acres recommended for designation (Map 4-6)	26,150
Total acres in the wilderness study area (WSA)	26,150

### *Impacts on Wilderness Values*

Wilderness designation of the 26,150 acres recommended suitable would protect wilderness values on the entire WSA.

The outstanding opportunities for solitude in drainages such as West Mill Creek, Trail Gulch, and along Beaver Creek and other remote areas of the WSA would be protected.

Since no mineral exploration nor development is projected on any of the four mining claims and the PFL harvest would not occur, wilderness values would be expected to be preserved in the entire WSA.

*Conclusion: Wilderness values would be preserved on the entire WSA and given long-term protection.*

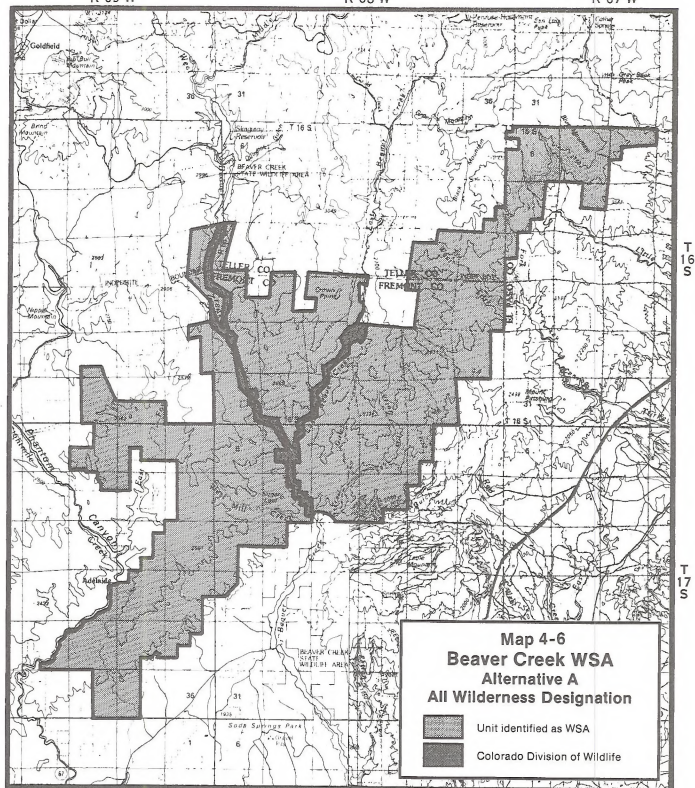
### *Impacts on Locatable Mineral Exploration and Development*

Under this alternative, the entire 26,150 acres in the WSA would be withdrawn from mineral entry except for those mining claims with proven valid existing rights prior to designation.

R 69 W

R 68 W

R 67 W



1 0 1 2 3 4 MILES

## CHAPTER 4. ENVIRONMENTAL CONSEQUENCES

Mineral development could still occur on the existing four claims (approximately 80 acres), if proven valid. However, since mineral potential for the entire WSA is considered low, no valid rights are anticipated and mineral exploration or development is not expected. The withdrawal would not cause significant adverse effects to mineral exploration and development because the development potential for all minerals is low.

*Conclusion: The entire 26,150 acres in the WSA would be withdrawn from mineral entry and exploration with the exception of up to approximately 80 acres dependent on the validity of four existing mining claims. There would be no significant impacts because of the low development potential for all minerals.*

### Impacts on Timber Production

Under this alternative, approximately 12,882 cords of pinon and juniper, over 160-year rotation age, would not be harvested on 493 operable acres of woodlands in the WSA as a timber production project.

In comparison there are 63,460 operable acres of woodlands with 590,100 cords of firewood (over 160-year rotation age) in the RGRA. The nearby Pike-San Isabel National Forest plans to harvest about 4,905,000 cords of firewood over the next 160 years. A planned harvest of 12,882 cords of firewood in the WSA would be about 2 percent of the potential harvest in the RGRA and substantially less than 1 percent of the total potential harvest in the RGRA and nearby national forest land combined.

The potential 5,142 Mbf of ponderosa pine and Douglas-fir on 177 operable acres of PFL would not be harvested over the 120-year rotation age under this alternative.

In comparison there are 240,300 Mbf (over 120-year rotation age) on 41,000 operable acres of PFL in the RGRA. The nearby Pike-San Isabel National Forest plans to harvest approximately 5,875,000 Mbf of sawtimber over the next 120 years. A planned harvest of 5,142 Mbf of sawtimber in this WSA would be about 2 percent of the total potential harvest in the RGRA and substantially less than 1 percent of the potential harvest on the combined RGRA and nearby national forest land.

*Conclusion: Wilderness designation would preclude harvest of 12,882 cords of firewood and 5,142 Mbf of sawtimber. This represents substantially less than 1 percent of the firewood and sawtimber in the RGRA and nearby national forest land.*

### Impacts on Wildlife Habitat and Population

Since there are no surface disturbing activities nor projects planned in the WSA, wildlife habitat would neither be improved nor disturbed. Therefore, it would remain at or near the present level and condition under wilderness designation.

Current estimated populations of 650 mule deer, 50 bighorn sheep, and 225 turkey would be unchanged. These numbers compare with estimated resource area totals of 7,000 mule deer, 300 bighorn sheep, and 1,200 turkey.

*Conclusion: Wildlife habitat would be protected and current populations of approximately 650 mule deer, 50 bighorn sheep, and 225 turkey would be unchanged.*

### Impacts on Recreation Use

Under wilderness designation, hiking, backpacking, and fishing use would remain at 700 annual recreation days and hunting use would remain at 100 annual hunter days. Although all the fishing would occur in Beaver Creek, about 90 percent of the hiking and backpacking would continue to occur in Trail Gulch, West Mill Creek, and along Beaver Creek. Hunting would be dispersed throughout the WSA. Because of restrictions on back-country vehicle travel, the existing 1,200 annual recreation days of car camping and back-country vehicle travel along the western boundary near Phantom Canyon would be precluded. No other activities would occur that would impact recreation use.

Total existing 2,000 annual recreation days would be expected to decrease to 800 in this alternative. This use would occur in a wilderness setting.

*Conclusion: Elimination of back-country vehicle use would result in a decrease of 1,200 annual recreation days, which is a reduction of 60 percent of existing use. All recreation use would occur in a wilderness setting.*

## ALTERNATIVE B - NO WILDERNESS DESIGNATION

Acres recommended for designation	0
Total acres in the wilderness study area (WSA)	26,150

### Impacts on Wilderness Values

The wilderness values in the entire WSA would not be protected by wilderness designation.

The planned harvest and thinning of woodlands (pinon and juniper) and PFL (ponderosa pine and Douglas-fir) and



## BEAVER CREEK WSA

associated access, proposed as timber projects, would disturb the vegetation on a total of approximately 670 acres. These projects would be done in the more rolling terrain in the southwestern portion of the WSA along the southern WSA boundary, west of East Eightmile Creek, between East Eightmile Creek and West Beaver Creek, and north of Little Turkey Creek. Naturalness would be lost on this land for about 60 to 80 years. The noise impacts would result in loss of opportunities for solitude and primitive and unconfined recreation on the same 670 acres on which the projects would occur, plus an additional 400 acres surrounding the projects during the time of operation.

*Conclusion: Of the 26,150 acres not recommended for designation, wilderness values would be lost for the long term on approximately 670 acres and the short term on an additional 400 acres. Although long-term protection would not be provided under this alternative, the remaining 25,080 acres would probably remain undisturbed in the foreseeable future and retain their wilderness values.*

### **Impacts on Locatable Mineral Exploration and Development**

Under this alternative, the entire 26,150 acres would remain open to mineral entry. However, since the mineral potential for the entire WSA is considered low and there are only four claims (approximately 80 acres), mineral exploration or development is not expected.

*Conclusion: The entire WSA would remain open to mineral entry; however, exploration or development is not expected. There would be no significant impacts because of low development potential for all minerals.*

### **Impacts on Timber Production**

About 12,882 cords of pinon and juniper would be harvested on the total 493 operable acres of woodlands in the WSA as timber production projects.

In comparison there are 590,100 cords of firewood (over 160-year rotation age) on 63,460 operable acres of woodlands in the Royal Gorge Resource Area (RGRA). The nearby Pike-San Isabel National Forest plans to harvest about 4,905,000 cords of firewood over the next 160 years. The harvest of 12,882 cords of firewood in the WSA would be about 2 percent of the potential harvest in the RGRA and substantially less than 1 percent of the total potential harvest in the RGRA and nearby national forest land combined.

The 5,142 Mbf of ponderosa pine and Douglas-fir on 177 operable acres of PFL in this WSA would be harvested over rotation age of 120 years.

In comparison, there are 240,300 Mbf (over 120-year rotation age) on 41,000 operable acres of PFL in the RGRA. The nearby Pike-San Isabel National Forest plans to harvest approximately 5,875,000 Mbf of sawtimber over the next 120 years. The planned harvest of 5,142 Mbf of sawtimber over 120-year rotation age in this WSA is about 2 percent of the potential harvest in the RGRA and substantially less than 1 percent of the potential harvest on the combined RGRA and nearby national forest land.

All the harvesting of firewood and sawtimber would occur on parcels located along the southern WSA boundary near the extreme southwestern portion of the WSA, west of East Eightmile Creek, between East Eight Mile Creek and West Beaver Creek, and north of Little Turkey Creek.

*Conclusion: About 12,882 cords of firewood and 5,142 Mbf of sawtimber in this WSA would be produced. This represents substantially less than 1 percent of the firewood and sawtimber in the RGRA and nearby national forest land.*

### **Impacts on Wildlife Habitat and Population**

Timber projects would neither disturb nor improve wildlife habitat and no wildlife projects are planned. Therefore, the habitat would remain at or near present level and condition under no wilderness designation.

Current estimated populations of 650 mule deer, 50 bighorn sheep, and 225 turkey would be unchanged. These numbers compare with estimated resource area totals of 7,000 mule deer, 300 bighorn sheep, and 1,200 turkey. Since no other projects would occur under this alternative, change in wildlife populations are not expected.

*Conclusion: Wildlife habitat would be maintained and current populations of approximately 650 mule deer, 50 bighorn sheep, and 225 turkey would be unchanged.*

### **Impacts on Recreation Use**

Existing use levels of about 700 annual recreation days of hiking, backpacking, and fishing would continue. About 90 percent of the hiking and backpacking would continue to occur in Trail Gulch, West Mill Creek, and along Beaver Creek. The existing 100 annual hunter days are expected to continue to be dispersed throughout the WSA; however, all the fishing would occur in Beaver Creek. In addition the existing 1,200 annual recreation days of car camping



## CHAPTER 4. ENVIRONMENTAL CONSEQUENCES

and associated back-country vehicle use are expected to continue along the western boundary near Phantom Canyon.

No activities are planned that would affect recreation use; as a result, the existing 2,000 annual recreation days would be maintained in this alternative. This use would occur in a predominantly primitive back-country setting.

*Conclusion: The existing 2,000 annual recreation days would be maintained. All recreation use would occur in a predominantly primitive back-country setting.*

### ALTERNATIVE D - PARTIAL WILDERNESS DESIGNATION—II

Acres recommended for designation (Map 4-7)	17,000
Acres not recommended for designation	<u>9,150</u>
Total acres in the wilderness study area (WSA)	26,150

#### *Impacts on Wilderness Values*

Wilderness designation of the 17,000 acres recommended as suitable would protect wilderness values on this portion of the WSA.

Outstanding opportunities for solitude in the canyon along Beaver Creek, in West Mill Creek, Trail Gulch, many of the drainages, and the many remote areas of this WSA would be protected.

The entire 17,000 acres recommended for wilderness designation are subject to claims with valid existing rights. However, no exploration nor development is expected in this portion of the WSA.

The timber projects within these 17,000 acres that would be completed under the no wilderness alternative would not occur under this alternative. Therefore, protection of all wilderness values would continue.

Wilderness values on the 9,150 acres not recommended as suitable would not be protected by wilderness designation.

On the portion not recommended, the planned harvest and thinning of woodlands and productive forest land (PFL) and associated access, proposed as timber production projects, would disturb a total of approximately 610 acres of the total 670 acres that would be lost under the no wilderness alternative. The forestry projects would be done in the extreme southwestern portion of the WSA, along the southern boundary, west of East Eightmile Creek, and north of Little Turkey Creek. The noise impacts would result in a loss of opportunities for solitude and primitive and unconfined recreation on the same 610 acres on which projects would occur plus an additional 350 acres around these projects only during the time of operation.

*Conclusion: Of the total 26,150 acres in this WSA, 17,000 acres would be designated wilderness and given long-term protection.*

*Wilderness values are expected to be lost for the long term on 610 acres and for the short term on an additional 350 acres. Although no long-term protection would be provided, wilderness values are expected to remain undisturbed on an additional 8,190 acres in the portion recommended unsuitable.*

#### *Impacts on Locatable Mineral Exploration and Development*

Under this alternative, the 17,000 acres recommended for wilderness designation would be withdrawn from mineral entry except for those mining claims with proven valid existing rights prior to designation. Currently there are no claims in this portion of the WSA. Because of the low mineral potential, and lack of existing claims, it is assumed there would be no valid existing rights prior to designation. Therefore, no exploration nor development is expected. The withdrawal would not cause significant adverse effects to mineral exploration and development because the development potential for all minerals is low.

The 9,150 acres not recommended for wilderness designation would remain open to mineral entry. However, since the mineral potential for the entire WSA is considered low, and there are only four mining claims (approximately 80 acres), mineral exploration or development is not expected.

*Conclusion: The 17,000 acres recommended for wilderness designation would be withdrawn from mineral entry subject to proven valid existing rights. Exploration and development could continue on the remaining 9,150 acres not recommended for wilderness designation. Mineral exploration or development is not expected in either portion of this WSA. There would be no significant impacts because of the low development potential for all minerals.*

#### *Impacts on Timber Production*

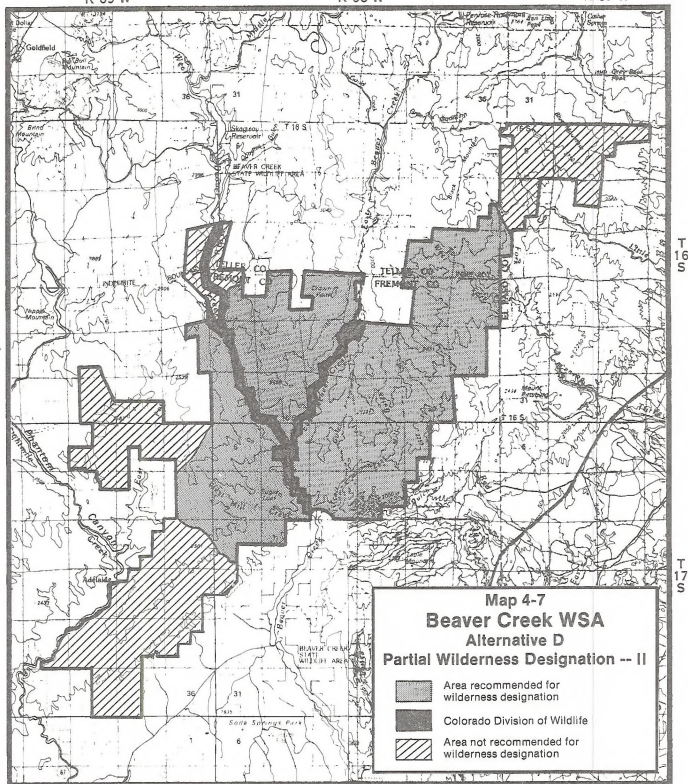
The 17,000 acres recommended for wilderness does not include any operable acres of woodlands. About 1,582 Mbf of ponderosa pine and Douglas-fir sawtimber on 57 acres of operable PFL would remain unharvested.

On the 9,150 acres not recommended for wilderness, about 12,882 cords of pinon and juniper would be harvested as timber production projects on the total 493 operable acres of woodlands along the southern boundary near the extreme southwestern part of the WSA.

R 69 W

R 68 W

R 67 W



1 0 1 2 3 4 MILES

## CHAPTER 4. ENVIRONMENTAL CONSEQUENCES

In comparison there are 590,100 cords of firewood (over 160-year rotation age) on 63,460 operable acres of woodlands in the Royal Gorge Resource Area (RGRA). The nearby Pike-San Isabel National Forest plans to harvest about 4,905,000 cords of firewood over the next 160 years. The harvest of 12,882 cords of firewood in the WSA would be about 2 percent of the potential harvest in the RGRA and substantially less than 1 percent of the total potential harvest in the RGRA and nearby national forest land combined.

Also on the 9,150 acres not recommended for wilderness, 3,560 Mbf of ponderosa pine and Douglas-fir sawtimber on 120 operable acres of PFL would be harvested under this alternative. This harvest would occur in locations west of East Eightmile Creek and north of Little Turkey Creek along the extreme northeastern WSA boundary.

In comparison there are 41,000 operable acres of PFL with 240,300 Mbf (over 120-year rotation age) in the RGRA. The nearby Pike-San Isabel National Forest plans to harvest approximately 5,875,000 Mbf of sawtimber over the next 120 years. The harvest of approximately 3,560 Mbf of sawtimber in this WSA is about 1 percent of the total potential harvest in the RGRA and substantially less than 1 percent of the potential harvest on the combined RGRA and nearby national forest land.

No other projects are planned that would impact timber production.

*Conclusion: All of the total 12,882 cords of firewood in the WSA and 3,560 Mbf of the total 5,142 Mbf of sawtimber would be produced. This represents substantially less than 1 percent of the firewood and sawtimber in the RGRA and nearby national forest land.*

### Impacts on Wildlife Habitat and Population

Since no surface disturbing activities would occur under wilderness designation, the existing wildlife habitat on 17,000 acres would be protected.

On the 9,150 acres not recommended for wilderness designation, no activities are planned that would change the existing wildlife habitat. Although forestry projects would take place on 613 acres, these are not expected to impact wildlife habitat. Therefore, existing populations of 650 mule deer, 50 bighorn sheep, and 225 turkey would be maintained. In comparison, wildlife populations in the RGRA are estimated at 7,000 mule deer, 300 bighorn sheep, and 1,200 turkey.

*Conclusion: Existing wildlife habitat would be maintained on both the 17,000 acres recommended and the 9,150 acres not*

*recommended for wilderness designation. Therefore, wildlife populations would remain at 650 mule deer, 50 bighorn sheep, and 225 turkey.*

### Impacts on Recreation Use

On the 17,000 acres recommended for wilderness designation, the 800 annual recreation days of hiking, backpacking, hunting, and fishing would be maintained. Approximately 95 percent of the hiking and backpacking would continue to occur in Trail Gulch, West Mill Creek, and along Beaver Creek. Hunting would continue to be dispersed throughout the WSA; however, all the fishing would occur in Beaver Creek. This use would occur in a wilderness setting.

On the 9,150 acres not recommended for wilderness designation, approximately 1,200 annual recreation days of hiking, car camping, and back-country vehicle use would continue. Almost all of this use would continue to occur near Phantom Canyon road along the western boundary. Back-country vehicle use in this portion of the WSA is mostly associated with the car camping that takes place along Phantom Canyon, on existing ways and trails. This use would occur in a predominantly primitive back-country setting.

In the portion not recommended, the timber projects described in Chapter 2 would occur in areas receiving little recreation use. Neither wildlife populations nor hunter days would increase; therefore, recreation use would not be affected.

*Conclusion: The existing 2,000 annual recreation days would be maintained. Recreation use would occur in a wilderness setting on the 17,000 acres recommended for wilderness designation and in a predominantly primitive back-country setting on the remaining 9,150 acres not recommended.*

## UPPER GRAPE CREEK (017)

### PROPOSED ACTION—ALTERNATIVE B - NO WILDERNESS DESIGNATION

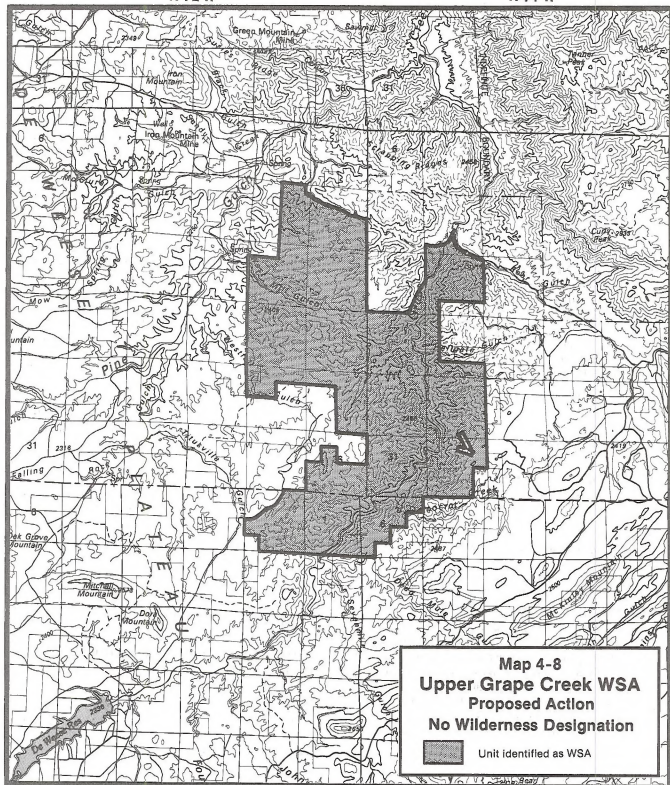
Acres recommended for designation (Map 4-8)	0
Total acres in wilderness study area (WSA)	10,200

### Impacts on Wilderness Values

The wilderness values in the entire WSA would not be protected by wilderness designation.

R 72 W

R 71 W





## CHAPTER 4. ENVIRONMENTAL CONSEQUENCES

The three water catchments and associated access proposed as a wildlife habitat project located south of East Pierce Gulch, west of West Mill Gulch, and south of Hellgate Gulch would disturb a total of about 5 acres. Naturalness would be lost on this land. There would be a loss of solitude and primitive and unconfined recreation on approximately 5 additional acres surrounding each project only during construction. However, construction time of only 12 days per catchment is expected.

The planned harvest and thinning of woodlands (pinon and juniper) and productive forest land (PFL) (ponderosa pine and Douglas-fir) and associated access, proposed as timber projects, would disturb primarily the vegetation on a total of approximately 1,925 acres. The forestry projects would be done in more gently sloping terrain between Pierce Gulch and Western Gulch.

Naturalness would be lost on this land for about 60 to 80 years. The noise impacts would result in loss of opportunities for solitude and primitive and unconfined recreation on the same 1,925 acres on which the projects would occur plus an additional 600 acres surrounding the projects during the time of operation.

Planned aquatic habitat improvement projects would be designed to blend in with the natural environment and would, therefore, not impact naturalness. However, solitude would be temporarily disturbed in the immediate area during the 1-week length of the project development.

*Conclusion: Of the 10,200 acres not recommended for designation, wilderness values would be lost for the long term on approximately 1,930 acres and the short term on an additional 613 acres. Although long-term protection would not be provided under this alternative, the remaining 7,655 acres would probably remain undisturbed in the foreseeable future and retain their wilderness values.*

### *Impacts on Locatable Mineral Exploration and Development*

Under this alternative, the entire 10,200 acres would continue to be available for exploration and development of locatable minerals. However, since the mineral potential for the entire WSA is considered low, mineral exploration or development is not expected.

*Conclusion: The entire WSA would remain open to mineral entry; however, exploration or development is not expected. There would be no significant impacts because of the low development potential for all minerals.*

### *Impacts on Forage Production and Livestock Management*

Planned pinon-juniper thinning projects totaling 900 acres are within 922 operable acres planned for harvest as a timber production project. As a result of this harvest, allocated AUMs are expected to increase from 800 to 860 within 5 to 10 years after completion and would be maintained at that level thereafter. This project would improve the forage condition on these 900 acres from the naturally occurring poor condition to good.

Since projects and associated road development for timber or wildlife projects would be scattered throughout the WSA and little surface disturbance would occur, forage production and livestock management would not be adversely affected.

*Conclusion: Range improvement projects would result in an additional 60 allocated AUMs, which is an 8 percent increase.*

### *Impacts on Timber Production*

About 26,840 cords of pinon and juniper would be harvested on the total 922 operable acres of woodlands in the WSA as timber production projects.

In comparison there are 590,100 cords of firewood (over 160-year rotation age) on 63,460 operable acres of woodlands in the Royal Gorge Resource Area (RGRA). The nearby Pike-San Isabel National Forest plans to harvest about 4,905,000 cords of firewood over the next 160 years. The harvest of 26,840 cords of firewood in the WSA would be about 5 percent of the potential harvest in the RGRA and about 1 percent of the total potential harvest in the RGRA and nearby national forest land combined.

The 28,886 Mbf of ponderosa pine and Douglas-fir on 1,003 operable acres of productive forest land (PFL) in this WSA would be harvested over rotation age of 120 years.

In comparison, there are 240,300 Mbf (over 120-year rotation age) on 41,000 operable acres of PFL in the RGRA. The nearby Pike-San Isabel National Forest plans to harvest approximately 5,875,000 Mbf of sawtimber over the next 120 years. The planned harvest of 28,886 Mbf of sawtimber over 120-year rotation age in this WSA is about 12 percent of the potential harvest in the RGRA and about 1 percent of the potential harvest on the combined RGRA and nearby national forest land.

All the harvesting for timber production projects would occur on parcels located between Pierce Gulch and Western Gulch.

Because of the size of the projects and the small amount of land that would be disturbed, projects and associated road development for wildlife projects would not adversely impact timber production.



## UPPER GRAPE CREEK WSA

*Conclusion: About 26,840 cords of firewood and 28,886 Mbf of sawtimber in this WSA would be produced. This represents about 1 percent of the firewood and sawtimber in the RGRA and nearby national forest land.*

### *Impacts on Wildlife Habitat and Population*

#### *Terrestrial*

Installation of three water catchments south of East Pierce Gulch, west of West Mill Gulch, and south of Hellgate Gulch are expected to result in estimated increases in mule deer from 270 to 295 and turkey from 75 to 125. Also as a result of a forestry harvest of sawtimber and firewood between Pierce Gulch and Western Gulch, it is estimated that mule deer would increase by 75 and turkey would increase by 50.

In comparison, total wildlife populations in the RGRA are estimated at 7,000 mule deer and 1,200 turkey.

As a result of disturbance associated with the access roads for forestry and wildlife projects, wildlife within the WSA would be minimally displaced. However, since the total 6.5 miles of road would be closed to the public during actual project development, and they would remain closed following completion of the projects, wildlife populations are not expected to decrease. The total area of disturbance from the roads providing access to the other projects would be less than 10 acres.

*Conclusion: Wildlife habitat and species distribution would improve and wildlife populations would increase by 100 mule deer and 100 turkey. This would be a 37 percent increase of mule deer in the WSA and 1 percent in the RGRA. Turkey would increase by 133 percent in the WSA and 8 percent in the RGRA.*

#### *Aquatic*

Neither the forestry nor terrestrial wildlife projects would affect the aquatic habitat within the WSA.

Deferred grazing along Grape Creek is reversing the declining condition of the riparian habitat. The proposed placement of rock gabions in Upper Grape Creek would create a favorable pool/riffle ratio for game fish. The combination of these improvement activities is expected to result in a 50-pound per acre increase in game fish and corresponding decrease in nongame fish.

*Conclusion: Existing riparian habitat along Grape Creek would improve and game fish in Grape Creek would increase by 500 percent or 50 pounds per acre and nongame fish would decrease by 56 percent or 50 pounds per acre.*

### *Impacts on Recreation Use*

Existing use levels of about 100 annual recreation days for hiking and backpacking would continue. About 90 percent of these uses occur along the Grape Creek corridor. A stream improvement project and increase of pounds per acre of game fish would result in an increase of annual angler days from 125 to 145. In addition, projects that would improve wildlife habitat and increase populations would result in the existing 25 annual hunter days increasing to 65. This use would continue to be dispersed throughout the WSA. Back-country vehicle use of 25 annual recreation days would be maintained and continue to be limited to existing ways and trails around the southwestern perimeter of the WSA.

The total existing 275 annual recreation days would be expected to increase to 335 in this alternative. This would occur in a predominantly primitive back-country setting.

The timber and wildlife projects and associated access would be in areas receiving little recreation use. The total 6.5 miles of access roads to be constructed for these projects would be closed to the public and, therefore, there would be no impacts to existing back-country vehicle use.

*Conclusion: An additional annual 60 recreation days, which is a 22 percent increase, are expected. All recreation use would occur in a predominantly primitive back-country setting.*

## ALTERNATIVE A - ALL WILDERNESS DESIGNATION

Acres recommended for designation	10,200
Total acres in the wilderness study area (WSA)	10,200

### *Impacts on Wilderness Values*

Wilderness designation of 10,200 acres recommended suitable would protect wilderness values on the entire WSA.

Opportunities for solitude in the canyon along Grape Creek, in many of the drainages, and in the many remote areas of this WSA would be protected.

Since no mineral exploration nor development is projected on any of the 31 mining claims and the firewood and sawtimber harvest and wildlife projects would not occur, wilderness values would be preserved in the entire WSA.

*Conclusion: Wilderness values would be preserved on the entire WSA and given long-term protection.*

## CHAPTER 4. ENVIRONMENTAL CONSEQUENCES

### *Impacts on Locatable Mineral Exploration and Development*

Under this alternative, the entire 10,200 acres in the WSA would be withdrawn from mineral entry except for those mining claims with proven valid existing rights prior to designation.

Mineral development could still occur on the existing 31 claims (approximately 620 acres), if proven valid. However, since mineral potential for the entire WSA is considered low, no valid rights are anticipated and mineral exploration or development is not expected. The withdrawal would not cause significant adverse effects to mineral exploration and development because the development potential for all minerals is low.

*Conclusion: The entire 10,200 acres would be withdrawn from mineral entry and exploration with the exception of up to approximately 620 acres dependent on the validity of 31 existing mining claims. There would be no significant impacts because of low development potential for all minerals.*

### *Impacts on Forage Production and Livestock Management*

Since no projects would be implemented under this alternative, the existing 800 AUMs would be maintained.

*Conclusion: The current 800 AUMs would be maintained.*

### *Impacts on Timber Production*

Under this alternative, approximately 26,840 cords of pinon and juniper, over 160-year rotation age, would not be harvested on 922 operable acres of woodlands in the WSA.

In comparison there are 63,460 operable acres of woodlands with 590,100 cords of firewood (over 160-year rotation age) in the RGRA. The nearby Pike-San Isabel National Forest plans to harvest about 4,905,000 cords of firewood over the next 160 years. A planned harvest of 26,840 cords of firewood in the WSA would be about 5 percent of the potential harvest in the RGRA and about 1 percent of the total potential harvest in the RGRA and nearby national forest land combined.

The potential 28,886 Mbf of ponderosa pine and Douglas-fir on 1,003 operable acres of PFL would not be harvested over 120-year rotation age under this alternative.

In comparison there are 240,300 Mbf (over 120-year rotation age) on 41,000 operable acres of PFL in the RGRA. The nearby Pike-San Isabel National Forest plans to harvest approximately 5,875,000 Mbf of sawtimber over the next 120 years. A planned harvest of 28,886 Mbf of sawtimber

in this WSA would be about 12 percent of the total potential harvest in the RGRA and about 1 percent of the potential harvest on the combined RGRA and nearby national forest land.

*Conclusion: Wilderness designation would preclude the harvest of 26,840 cords of firewood and 28,886 Mbf of sawtimber. This represents about 1 percent of the firewood and sawtimber in the RGRA and nearby national forest land.*

### *Impacts on Wildlife Habitat and Population*

#### *Terrestrial*

Since no projects would be implemented within the WSA, wildlife habitat would neither be improved nor disturbed. Therefore, under wilderness designation wildlife habitat would remain at or near the present level and condition.

Current estimated populations of 270 mule deer and 75 turkey would be unchanged. These numbers compare with estimated resource area totals of 7,000 mule deer and 1,200 turkey.

*Conclusion: Wildlife habitat would be protected and current populations of approximately 270 mule deer and 75 turkey would be unchanged.*

#### *Aquatic*

Wilderness designation would protect existing aquatic habitat; therefore, present fish populations would remain at approximately 100 pounds per acre and consist of approximately 90 percent nongame species and 10 percent game species.

Since livestock grazing has been deferred from along Grape Creek, the declining condition of the riparian habitat has been reversing. However, improved riparian habitat as a result of deferred grazing alone is not expected to increase game fish populations.

*Conclusion: Existing riparian habitat would be protected and current game fish populations in Grape Creek of approximately 10 pounds per acre and nongame fish populations of approximately 90 pounds per acre would be maintained.*

### *Impacts on Recreation Use*

Under wilderness designation, hiking and backpacking use would remain at 100 annual recreation days; fishing use would remain at 125 annual angler days. Because of

## SAND CASTLE WSA

restrictions on back-country vehicle travel, hunting use would decrease from 25 to 15 annual hunter days and the 25 annual back-country vehicle days would not occur. All of the fishing and about 90 percent of the recreation use would continue to occur along Grape Creek, except hunting, which would continue to be dispersed throughout the WSA.

Total existing 275 annual recreation days would be expected to decrease to 240 in this alternative. This use would occur in a wilderness setting.

*Conclusion: Elimination of back-country vehicle use would result in a decrease of 35 annual recreation days, which is a reduction of 13 percent of existing use. All recreation use would occur in a wilderness setting.*

### SAND CASTLE (135)

#### PROPOSED ACTION—ALTERNATIVE B - NO WILDERNESS DESIGNATION

Acres recommended for designation (Map 4-9)	0
Total acres in the wilderness study area (WSA)	1,644

##### *Impacts on Wilderness Values*

The wilderness values in the entire WSA would not be protected by wilderness designation.

Since no activities are planned, and since ORV use is widely dispersed, this WSA is expected to remain largely undisturbed in the foreseeable future. As a result wilderness values are expected to be retained, although no long-term protection would be provided under this alternative.

*Conclusion: Although long-term protection would not be provided under this alternative, the entire 1,644 acres would probably remain undisturbed in the foreseeable future and retain their wilderness values.*

##### *Impacts on Locatable Mineral Exploration and Development*

Under this alternative, the entire 1,644 acres would continue to be available for exploration and development of locatable minerals. However, since the mineral potential for the entire WSA is considered low and there are no mining claims, mineral exploration or development is not expected.

*Conclusion: The entire WSA would remain open to mineral entry; however, exploration or development is not expected. There would be no significant impacts because of the low development potential for all minerals.*

##### *Impacts on Wildlife Habitat and Population*

There is almost no wildlife habitat and no known wildlife populations in this WSA. Since no projects are planned, the existing wildlife habitat would be maintained but there would continue to be little or no wildlife in the WSA.

*Conclusion: The existing wildlife habitat would be maintained; however, there would continue to be no significant numbers of wildlife in the WSA.*

##### *Impacts on Recreation Use*

Existing use levels of about 75 annual recreation days of hiking and back-country vehicle use would continue. This use would be dispersed throughout the three parcels adjacent to the western boundary of the Great Sand Dunes Wilderness area.

No activities are planned that would affect recreation use; therefore, the existing 75 annual recreation days would be maintained. This use would occur in a predominantly primitive back-country setting.

*Conclusion: The existing 75 annual recreation days would be maintained. All recreation use would occur in a predominantly primitive back-country setting.*

#### ALTERNATIVE A - ALL WILDERNESS DESIGNATION

Acres recommended for designation	1,644
Total acres in wilderness study area (WSA)	1,644

##### *Impacts on Wilderness Values*

Wilderness designation of 1,644 acres recommended suitable would protect the wilderness values on the entire WSA.

Since no valid existing rights are expected and, therefore, mineral exploration or development is not projected, wilderness values would be expected to be maintained in the entire WSA.

R 12 E

R 73 W

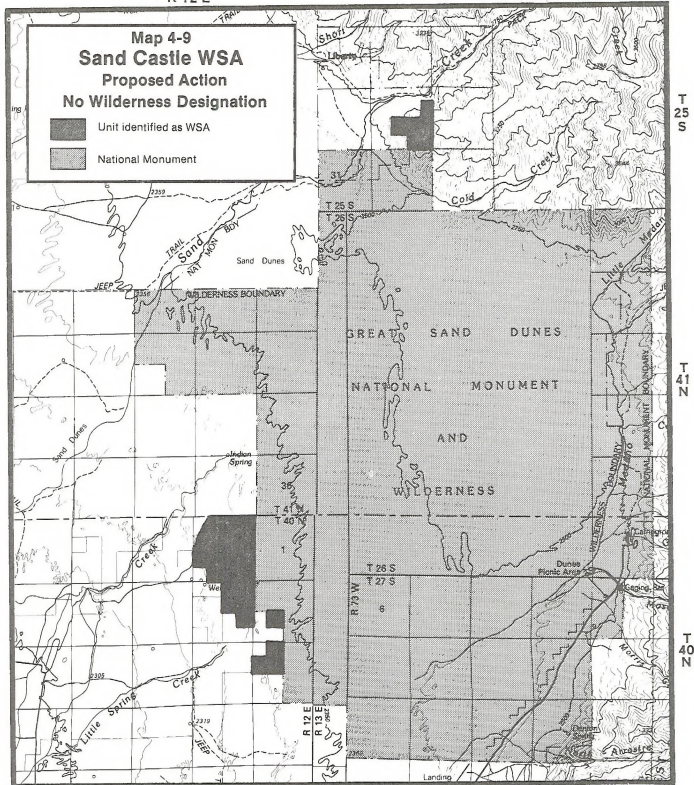
**Map 4-9**  
**Sand Castle WSA**  
**Proposed Action**  
**No Wilderness Designation**



Unit identified as WSA



National Monument



1 0 1 2 3 MILES

## SAN LUIS HILLS WSA

*Conclusion: Wilderness values would be preserved on the entire WSA and given long-term protection.*

### **Impacts on Locatable Mineral Exploration and Development**

Under this alternative, the entire 1,644 acres in the WSA would be withdrawn from mineral entry except for those mining claims with proven valid existing rights prior to designation.

Since there are currently no mining claims and mineral potential for the entire WSA is considered low, mineral exploration or development is not expected. The withdrawal would not cause significant adverse effects to mineral exploration and development because the development potential for all minerals is low.

*Conclusion: The entire 1,644 acres would be withdrawn from mineral entry and exploration with the exception of proven valid existing rights. Mineral exploration or development is not expected. There would be no significant impacts because of the low development potential for all minerals.*

### **Impacts on Wildlife Habitat and Population**

There is almost no wildlife habitat and no known wildlife populations in this WSA. Since no projects are planned, the existing wildlife habitat would be maintained and there would continue to be little or no wildlife in the WSA.

*Conclusion: The existing wildlife habitat would be protected; however, there would continue to be no significant numbers of wildlife in the WSA.*

### **Impacts on Recreation Use**

Under wilderness designation the 5 annual recreation days of hiking would continue to be dispersed throughout the three parcels adjacent to the western boundary of the Great Sand Dunes Wilderness area. However, because of restrictions on back-country vehicle travel, the existing 70 annual recreation days of this use would not occur.

The total existing 75 annual recreation days would be expected to decrease to 5 in this alternative. This use would occur in a wilderness setting.

*Conclusion: Elimination of back-country vehicle use would result in a decrease of 70 annual recreation days, which is a reduction of 93 percent of existing use. All recreation use would occur in a wilderness setting.*

## SAN LUIS HILLS (141)

### **PROPOSED ACTION—ALTERNATIVE B - NO WILDERNESS DESIGNATION**

Acres recommended for designation (Map 4-10) 0

Total acres in wilderness study area (WSA) 10,240

### **Impacts on Wilderness Values**

The wilderness values in the entire WSA would not be protected by wilderness designation.

Since no mineral exploration nor development is expected and no projects are planned, the entire WSA would probably be undisturbed in the foreseeable future. As a result, wilderness values are expected to be retained, although no long-term protection would be provided under this alternative.

This WSA is in the fescue-mountain muhly-prairie classification of the Rocky Mountain Province as identified by the Bailey-Kuchler Ecosystem map of ecoregions in the United States. Besides this WSA, there are approximately 600 acres of this classification in other WSAs in Colorado. However, since no surface disturbance is expected in this WSA, this vegetation would not be disturbed although no long-term protection would be provided under this alternative.

*Conclusion: Although long-term protection would not be provided under this alternative, the entire 10,240 acres would probably remain undisturbed in the foreseeable future and retain their wilderness values.*

### **Impacts on Locatable Mineral Exploration and Development**

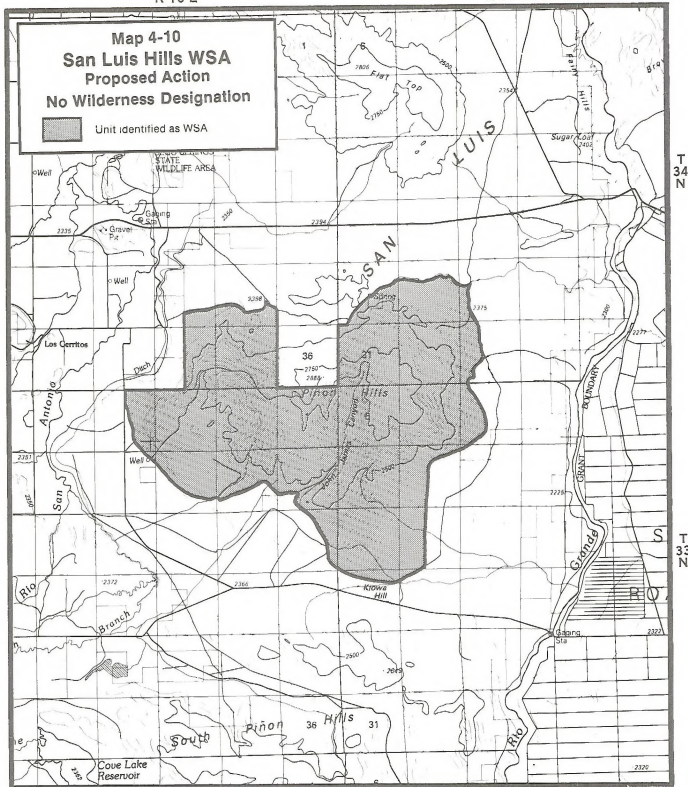
Under this alternative, the entire 10,240 acres would continue to be available for exploration and development of locatable minerals. There are currently 67 mining claims (approximately 1,340 acres). Since the mineral potential for the entire WSA is considered low, mineral exploration or development is not expected.

*Conclusion: The entire WSA would remain open to mineral entry; however, exploration or development is not expected. There would be no significant impacts because of the low development potential for all minerals.*



R 11 E

## Unit identified as WSA

T  
34  
NT  
33  
N

4-36

## SAN LUIS HILLS WSA

### *Impacts on Wildlife Habitat and Population*

No projects nor surface disturbing activities would be implemented in this WSA; therefore, wildlife habitat would remain at or near the present level and condition.

Current estimated populations of 150 mule deer and 85 antelope would be unchanged. These numbers compare with estimated totals of 2,000 mule deer and 2,300 antelope in the San Luis Resource Area (SLRA).

*Conclusion: The existing wildlife habitat would be maintained and current populations of approximately 150 mule deer and 85 antelope would be unchanged.*

### *Impacts on Recreation Use*

Since no projects are planned in this WSA, the total 350 annual recreation days would be maintained and would occur in a predominantly primitive back-country setting.

About 75 percent of the 35 annual recreation days of hiking and backpacking would continue to occur in John James Canyon and the higher elevations of the WSA. The existing 150 annual hunter days would continue to be dispersed throughout the WSA. Back-country vehicle use of 165 annual recreation days would be maintained and continue to be limited to existing ways and trails in John James Canyon along the western WSA boundary, and in the northeastern portion of the WSA.

*Conclusion: The existing 350 annual recreation days would be maintained. All recreation use would occur in a predominantly primitive back-country setting.*

### **ALTERNATIVE A - ALL WILDERNESS DESIGNATION**

Acres recommended for designation	10,240
Total acres in wilderness study area (WSA)	10,240

### *Impacts on Wilderness Values*

Wilderness designation of 10,240 acres recommended suitable would protect wilderness values on the entire WSA. The opportunities for solitude in the gullies along the eastern boundary and other remote areas of the WSA would be protected.

Since no mineral exploration nor development is projected on any of the 67 mining claims, wilderness values would be expected to be preserved in the entire WSA.

*Conclusion: Wilderness values would be preserved on the entire WSA and given long-term protection.*

### *Impacts on Locatable Mineral Exploration and Development*

Under this alternative, the entire 10,240 acres in the WSA would be withdrawn from mineral entry except for those mining claims with proven valid existing rights prior to designation.

Mineral development could still occur on the existing 67 claims (approximately 1,340 acres), if proven valid. However, since mineral potential for the entire WSA is considered low, no valid rights are anticipated and mineral exploration or development is not expected. The withdrawal would not cause significant adverse effects to mineral exploration and development because the development potential for all minerals is low.

*Conclusion: The entire 10,240 acres would be withdrawn from mineral entry and exploration with the exception of up to approximately 1,340 acres dependent on the validity of 67 existing mining claims. There would be no significant impacts because of the low development potential for all minerals.*

### *Impacts on Wildlife Habitat and Population*

Since no projects would occur in this WSA, wildlife habitat would remain at or near the present level and condition under wilderness designation.

Current estimated populations of 150 mule deer and 85 antelope would be unchanged. These numbers compare with estimated totals of 2,000 mule deer and 2,300 antelope in the SLRA.

*Conclusion: Wildlife habitat would be protected and current populations of approximately 150 mule deer and 85 antelope would be unchanged.*

### *Impacts on Recreation Use*

Under wilderness designation, hiking and backpacking use would remain at 35 annual recreation days. Because of restrictions on motorized vehicle travel, hunting use would decrease from 150 to 125 annual hunter days and the 165 annual back-country vehicle days would not occur. Approximately 75 percent of the hiking and backpacking would continue to occur in John James Canyon and the higher elevations of the WSA. However, hunting would continue to be dispersed throughout the WSA.

## CHAPTER 4. ENVIRONMENTAL CONSEQUENCES

Total existing 350 annual recreation days would be expected to decrease to 160 in this alternative. This use would occur in a wilderness setting.

*Conclusion: Elimination of back-country vehicle use would result in a decrease of 190 annual recreation days, which is a reduction of 54 percent of existing use. All recreation use would occur in a wilderness setting.*

### ALTERNATIVE C - PARTIAL WILDERNESS DESIGNATION

Acres recommended for designation (Map 4-11)	7,440
Acres not recommended for designation	<u>2,800</u>
Total acres in wilderness study area (WSA)	10,240

#### *Impacts on Wilderness Values*

Wilderness designation of the 7,440 acres recommended as suitable would protect wilderness values on this portion of the WSA. Outstanding opportunities for solitude in some of the gullies along the eastern boundary and remote areas of this WSA would be protected.

The entire 7,440 acres recommended for wilderness designation are subject to claims with valid existing rights. However, since this portion of the WSA has low mineral potential and only nine mining claims, no exploration nor development is expected. Since there are no other projects proposed in this WSA, wilderness values would be preserved in this portion.

The wilderness values in the 2,800 acres not recommended for wilderness would not be given the protection of wilderness designation. However, since no mineral exploration nor development is expected and no projects are planned, these 2,800 acres would probably be undisturbed in the foreseeable future. As a result, the wilderness values are expected to be preserved although no long-term protection would be provided under this alternative.

*Conclusion: Of the total 10,240 acres in this WSA, 7,440 acres would be designated wilderness and given long-term protection. Although long-term protection would not be provided under this alternative, wilderness values would be expected to remain undisturbed in the foreseeable future on the remaining 2,800 acres.*

#### *Impacts on Locatable Mineral Exploration and Development*

Under this alternative, the 7,440 acres recommended for wilderness designation would be withdrawn from mineral entry except for those mining claims with proven valid existing rights prior to designation. Currently there are nine claims totaling 180 acres in this portion of the WSA. Because of the low mineral potential, it is assumed there would be no valid existing rights prior to designation. Therefore, no exploration nor development is expected. The withdrawal would not cause significant adverse effects to mineral exploration and development because the development potential for all minerals is low.

The 2,800 acres, not recommended for wilderness designation, would continue to be available for exploration and development of locatable minerals. However, since the mineral potential for the entire WSA is considered low, mineral exploration or development is not expected. Currently there are 58 mining claims totaling 1,160 acres in this portion of the WSA.

*Conclusion: The 7,440 acres recommended for wilderness designation would be withdrawn from mineral entry subject to proven valid existing rights. Exploration and development could continue on the remaining 2,800 acres not recommended for wilderness designation. Mineral exploration or development is not expected in either portion of this WSA. There would be no significant impacts because of the low development potential for all minerals.*

#### *Impacts on Wildlife Habitat and Population*

Since no projects would occur, the existing wildlife habitat on the 7,440 acres recommended for wilderness would be protected by wilderness designation.

On the 2,800 acres not recommended for wilderness designation, no activities are planned that would change the existing wildlife habitat.

Since no projects are planned in either portion of the WSA, existing populations of 150 mule deer and 85 antelope would be maintained. In comparison wildlife populations in the SLRA are estimated at 2,000 mule deer and 2,300 antelope.

*Conclusion: Existing wildlife habitat would be maintained on both the 7,440 acres recommended and the 2,800 acres not recommended for wilderness designation. Therefore, wildlife populations would remain at 150 mule deer and 85 antelope.*

R 10 E

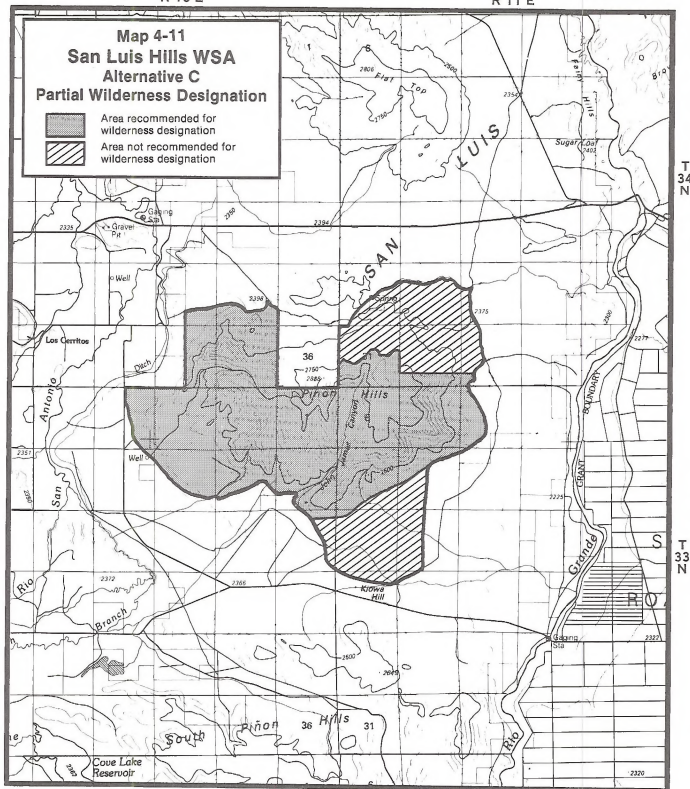
R 11 E

**Map 4-11**  
**San Luis Hills WSA**  
**Alternative C**  
**Partial Wilderness Designation**



Area recommended for  
wilderness designation

Area not recommended for  
wilderness designation



1 0 1 2 3 MILES

## CHAPTER 4. ENVIRONMENTAL CONSEQUENCES

### *Impacts on Recreation Use*

On the 7,440 acres recommended for wilderness designation, the annual 30 hiking and backpacking recreation days would be maintained. Because of restricted back-country vehicle travel, annual hunter days would decrease from approximately 110 to 90 and the existing 135 annual back-country vehicle recreation days in this portion of the unit would not occur. Hiking and backpacking would continue to occur in John James Canyon and the higher elevations of the WSA. However, hunting would continue to be dispersed throughout the WSA.

In the portion recommended, the total existing 275 annual recreation days would be expected to decrease to 120. This use would occur in a wilderness setting.

On the 2,800 acres not recommended for wilderness designation, approximately 5 annual recreation user days of hiking and backpacking would continue. The existing 40 annual hunter days would continue. Existing back-country vehicle use of 30 annual recreation days would also continue, primarily in the northeastern portion of the WSA.

In this portion not recommended, the total 75 annual recreation days would be expected to continue. This use would occur in a predominantly primitive back-country setting.

*Conclusion: Elimination of back-country vehicle use would result in a decrease of 155 annual recreation days, which is a 44 percent decrease from existing use in the entire WSA. Recreation use would occur in a wilderness setting on the 7,440 acres recommended for wilderness designation and in a predominantly primitive back-country setting on the remaining 2,800 acres not recommended.*

## IRREVERSIBLE AND IRRETRIEVABLE COMMITMENTS OF RESOURCES

The proposed action involves, to varying degrees, irreversible and irretreivable commitments of certain resources in the 5,400 acres of the Beaver Creek WSA and 50,104 acres in five other WSAs not recommended for designation as wilderness. The allocation of these lands to such consumptive uses as mining, firewood and sawtimber harvest, and back-country vehicle use could result in irreversible and irretreivable losses of wilderness values over the long term.

Wilderness designation of 6,614 acres in Browns Canyon WSA and 20,750 acres of the Beaver Creek WSA would not create an irretreivable or irreversible commitment of resources. Wilderness would restrict or stop the development of certain natural resources in order to maintain wilderness values. If, in the future, Congress believed resources present in the areas recommended for designation must be developed in the national interest, it could then modify the law to allow for the development.

## SHORT-TERM USES VS. LONG-TERM PRODUCTIVITY

The basic objective of the proposed action is to establish an appropriate allocation of resources consistent with the principles of multiple use and sustained-yield. The proposed action provides for the protection of wilderness and associated values in the Browns Canyon WSA and on 20,750 acres of the Beaver Creek WSA. However, the development and use of other resources would be allowed in the 5,400 acres of the Beaver Creek WSA and the other five WSAs recommended as unsuitable for wilderness.

The use of some resources in the WSAs for designation would be prohibited. Wilderness values would benefit from designation over the long term. The loss of production of firewood and sawtimber would be long term.

Nondesignation would allow the use of resources in the WSAs not recommended for wilderness designation. In addition firewood and sawtimber could be harvested and projects could be completed, which would improve forage production and wildlife habitat.



**CHAPTER FIVE**  
**CONSULTATION**



## CHAPTER 5. CONSULTATION

This section discusses various types of consultation including predraft consultation and coordination with private/public entities. It also describes the process after the draft environmental impact statement (DEIS) was prepared; i.e., description of hearings, letters received, etc., and includes the letters with responses to substantial comments. The mailing list and names of BLM personnel who prepared the FEIS are included in the Support Data section.

### PREDRAFT CONSULTATION

Informal local consultation with various individuals, groups, and public agencies occurred during early data gathering stages of the planning process of the Royal Gorge Resource Area (RGRA) Management Framework Plan (MFP) specific to wilderness resources. The San Luis Resource Area (SLRA) plans were completed prior to the Federal Land Policy Management Act (FLPMA) in 1976 and did not consider wilderness values.

Public comments received at various times in the RGRA-MFP planning process often were very general and in many cases stated preference only for more or less wilderness. Some specific comments were received during the wilderness inventory phase and early wilderness study phase (through November 1980). In addition during the preparation of the management situation analysis (MSA), a scoping meeting and one series of open houses to consider alternatives were held. All input received is included in the final MSA. The next major use of input into this process was the solicitation of comments on the draft environmental impact statement (DEIS).

### DRAFT CONSULTATION

#### MEETINGS AND BRIEFINGS

Additional consultation was accomplished through meetings and briefings. A special briefing organized by the State A-95 Clearing House office was held for Colorado State agencies in Denver; however, very few agencies were represented. Various telephone conversations with public officials and private individuals provided information and clarification on the DEIS material. Meetings to inform and

provide clarification were conducted with one council of governments and one county.

### HEARINGS

Formal public hearings were held in various locations from 7 to 9 p.m. and are described below:

Location	Date	Attendance	No. of Speakers
Alamosa, Colorado	10/12/82	11	4
Canon City, Colorado	10/12/82	19	6
Salida, Colorado	10/13/82	10	4
Colorado Springs, Colorado	10/14/82	26	10
Total		66	24

The Colorado State Director appointed three hearings officers to preside over the hearings, which were recorded verbatim by professional court reporters. Statements from 24 speakers were reviewed; 12 comments contained new data, questioned facts and/or adequacy, and raised questions or issues relating directly to the DEIS. The full hearings transcripts are not reproduced in this document because of length; however, they are available for review in the Canon City District office. The substantial comments included during the hearings were also contained in written comments, all of which have been addressed. Therefore, hearing comments are not shown in this FEIS. The participation and input of each individual are appreciated and each comment was carefully considered.

### WRITTEN STATEMENTS

As a result of the public involvement and public review of the DEIS, 98 letters were received, all of which are reproduced in this chapter.

Substantial comments in letters are bracketed and numbered with the corresponding response displayed to the right of the letter.

## CHAPTER 5. CONSULTATION

Some of the comment letters refer to the term "preferred alternative." This term has been changed to "proposed action" in this revision of the FEIS. Therefore, proposed action and preferred alternative mean the same.

Although only the substantial comments have been addressed in this FEIS, the participation and input from each agency, organization, and individual is appreciated and each comment was carefully considered.

### COMMENTS AND RESPONSES

Table 5-1 lists letter numbers and names of commenters. These numbers are used to identify the reprinted letters and corresponding responses in this chapter.

TABLE 5-1  
List of Contributor Letters

Index Number	Agency, Group, or Individual
<b>Federal Agencies</b>	
1-93	USDI, Bureau of Mines, Denver, Colorado
2-3	USDI, Bureau of Reclamation, Lower Missouri Region, Denver, Colorado
3-94	USDI, Fish and Wildlife Service, Golden, Colorado
4-97	USDI, Fish and Wildlife Service, Grand Junction, Colorado
5-47	USDI, Mineral Management Services, Virginia (telephone call)
6-74	USDI, National Park Service, Rocky Mountain Regional Office, Denver, Colorado
7-92	USDI, National Park Service, Rocky Mountain Regional Office, Denver, Colorado
8-96	USDI, National Park Service, Great Sand Dunes National Monument, Mosca, Colorado
9-98	USDI, National Park Service, Rocky Mountain Regional Office, Denver, Colorado
10-1	USDA, Forest Service, Pike and San Isabel National Forest, Pueblo, Colorado
11-11	USDA, Forest Service, Rio Grande National Forest, Monte Vista, Colorado
12-2	U.S. Department of the Airforce, Central Region, Dallas, Texas
13-86	U.S. Environmental Protection Agency, Region VIII, Denver, Colorado

<b>State Agencies</b>	
14-7	Colorado Department of Corrections, Denver, Colorado
15-66	Colorado Historical Society, Denver, Colorado
16-95	Colorado Historical Society, Denver, Colorado
17-65	Colorado Natural Heritage Inventory, Denver, Colorado
18-67	State of Colorado, Department of Highways, Denver, Colorado
19-63	State of Colorado, Division of Local Government, Denver, Colorado
20-77	State of Colorado, Department of Natural Resources, Colorado Natural Areas Program, Denver, Colorado
21-80	State of Colorado, Department of Natural Resources, Denver, Colorado
22-51	State of Colorado, Division of Parks and Outdoor Recreation, Denver, Colorado
23-68	State of Colorado, Division of Water Resources, Denver, Colorado
24-64	State of Colorado, Division of Wildlife, Denver, Colorado
<b>Local Agencies</b>	
25-18	Center Soil Conservation District, Center, Colorado
26-23	City of Colorado Springs, Office of the Mayor, Colorado Springs, Colorado
27-36	City of Colorado Springs, Colorado Springs, Colorado
28-69	City of Colorado Springs, Office of the Mayor, Colorado Springs, Colorado
29-87	City of Pueblo, Pueblo, Colorado
30-71	El Paso County, Colorado Springs, Colorado
31-33	Pikes Peak Area Council of Governments, El Paso County Land Use, Colorado Springs, Colorado
32-32	Pikes Peak Area Council of Governments, Regional Planner, Colorado Springs, Colorado
33-91	Pueblo County Commissioners, Pueblo, Colorado
34-73	Teller County, Cripple Creek, Colorado
<b>Individual, Group, or Agency</b>	
35-4	Bruce Berger, Aspen, Colorado
36-5	John Stansfield, Colorado Springs, Colorado, (representing Sierra Club, Pikes Peak Group)
37-6	Donald E. Potter, Canon City, Colorado
38-8	Jeffrey Keidel, Burlington, Colorado
39-9	Heather Hubbard, Manitou Springs, Colorado
40-10	Toni Evans, Buena Vista, Colorado
41-12	Stewart M. Green, Colorado Springs, Colorado
42-13	Nick Ervin, Englewood, California
43-14	Craig Lindley, Manitou Springs, Colorado
44-15	Judy Lewallen, Elizabeth Stewart, Holly Tanden, Anita Brown, Colorado Springs, Colorado
45-16	Barbara Whipple, Buena Vista, Colorado

# WRITTEN STATEMENTS

Table 5-1 Comments and Responses (Continued)

Index Number	Agency, Group, or Individual		
46-17	Gernot and Ava Heinrichsdorff, Colorado Springs, Colorado	75-53	Edward Gubrud, Colorado Springs, Colorado
47-19	Dick Scar, Buena Vista, Colorado (representing The Upper Arkansas Coalition)	76-54	Michael Farady, Colorado Springs, Colorado
48-20	Deborah Hayes, Boulder, Colorado	77-55	Brooke Burbank, Colorado Springs, Colorado
49-21	Lynn Cudlip, Grand Junction, Colorado	78-56	Alan B. Lilly and Margaret Leavitt, Denver, Colorado
50-22	Reed and Karen Dils, Buena Vista, Colorado	79-57	Richard Casey, Boulder, Colorado
51-24	Kirk Cunningham, Denver, Colorado (representing Sierra Club, Enos Mill Group)	80-58	Richard Reynolds, Boulder, Colorado
52-25	Sally Stewart, Colorado Springs, Colorado	81-59	Susan Hodgson, Colorado Springs, Colorado
53-26	Bruce Jensen, Colorado Springs, Colorado	82-60	Colorado Wilderness Network, Denver, Colorado
54-27	Peter C. Eisele, Colorado Springs, Colorado	83-61	Margaret Leavitt and Alan Lilly, Denver, Colorado
55-28	Willie Johnson, Golden, Colorado	84-62	Tom Bouchard, Canon City, Colorado
56-29	Raymond Vavrinek, Colorado Springs, Colorado	85-70	John Stansfield, Jr., Colorado Springs, Colorado, (representing Sierra Club, Pikes Peak Group)
57-30	Stella Bailey, Buena Vista, Colorado	86-72	Mark Slater, Evergreen, Colorado
58-31	Chris Wall, Colorado Springs, Colorado	87-75	Rosalind McClellan, Boulder, Colorado
59-34	John Wallace, Colorado Springs, Colorado	88-76	Sharyl Kinnear, Boulder, Colorado
60-35	John Wallace, Colorado Springs, Colorado	89-78	Nancy Strong, Antonito, Colorado
61-37	Louisa Stark, Boulder, Colorado	90-79	Lisa Sydow, Boulder, Colorado
62-38	Andrew McConkey, Boulder, Colorado	91-81	Minerals Exploration Coalition, Denver, Colorado
63-39	Chevron U.S.A., Denver, Colorado	92-82	M. Havens, Boulder, Colorado
64-40	Atlantic Richfield, Denver, Colorado	93-83	Jim Morris and David Walder, Boulder, Colorado
65-41	Suzanne H. Kaempfer, Boulder, Colorado	94-84	Eric and Marcy Kelly, Canon City, Colorado
66-42	Frances C. Carter, Pueblo, Colorado	95-85	Colorado Mountain College, Leadville, Colorado
67-43	F. Martin Brown, Colorado Springs, Colorado	96-88	Wexpro Company, Salt Lake City, Utah
68-44	Petition from Marcy Kelly, Canon City, Colorado (representing residents of Fremont County)	97-89	Amoco, Denver, Colorado
69-45	David Lucas, Boulder, Colorado	98-90	James G. Felt, Colorado Springs, Colorado, (attorney for City of Cripple Creek)
70-46	Mary Ann Robinson, Colorado Springs, Colorado		
71-48	Rocky Smith, Denver, Colorado		
72-49	Dorothy Gunmaer, Colorado Springs, Colorado		
73-50	Ideal Basic Industries, Denver, Colorado		
74-52	Foster-Morrell Engineering Associates, Colorado Springs, Colorado		





# United States Department of the Interior

## BUREAU OF MINES

P. O. BOX 2506  
BUILDING 20, DENVER FEDERAL CENTER  
DENVER, COLORADO 80225

Intermountain Field Operations Center

February 25, 1986

### Memorandum

To: District Manager, Canon City District, U.S. Bureau of Land Management, 3080 East Main, P.O. Box 311, Canon City, Colorado 81212

From: Chief, Intermountain Field Operations Center

Subject: Review of draft environmental impact statement for Canon City District Management Framework Plan Wilderness Amendment

Bureau of Mines personnel have reviewed the subject reports regarding proposed management of seven wilderness study areas (WSA's) (62,868 acres) in south-central Colorado, as you requested on January 30. Our comments pertain to the discussion of mineral resources and the assessment of impacts under the plan.

Mineral resources, activities, and potential in each of the WSA's are described in some detail in the DEIS. In regard to the note (p. 50) that mineral assessments by the Bureau of Mines (BOM) and U.S. Geological Survey (USGS) will be prepared for areas recommended for wilderness, we note that the three recommended areas have been studied by the BOM and reports are available as follows:

Beaver Creek - Bureau of Mines Open-file Report MLA 32-85  
Browns Canyon - Bureau of Mines Open-file Report MLA 70-85  
Sand Castle - Bureau of Mines Open-file Report MLA 24-84.

Results of these studies indicate that Beaver Creek contains a small resource of fluorspar, and dolomite resources crop out along the southeast edge of the area. The proposed exclusion from wilderness at the southern end of the WSA, however, would avoid commitment of the dolomite, and adjacent refractory clay deposits. The northern unit of the Sand Castle WSA has potential for base and precious metal deposits, similar to adjacent parts of the Sangre de Cristo WSA. The perlite deposit at Ruby Mountain, at the north edge of the Browns Canyon WSA, is a well-known mineral collecting site for specimens of garnet, obsidian ("Apache tears"), and topaz.

Although the Bureau of Mines has not made detailed assessments of the other WSA's, we note that Upper Grape Creek lies within the Wet Mountains thorium district; these deposits may be equally valuable for rare earth minerals,

as well. Moreover, the geologic environment in this WSA, and McIntyre Hill, indicates that these areas may be favorable for base metal deposits.

Effects of each alternative are described in the DEIS. We question, however, whether the general consequences on geology and minerals (p. 49) are correct. As we understand it, more restrictive regulations at 43 CFR 3802 apply to mineral exploration and development in WSA's (and to valid existing rights in designated wilderness?); the cited regulations at 43 CFR 3809 apply to other public land.

We believe the DEIS should make it clear that undiscovered mineral resources in designated areas would be committed (lost) to wilderness. The statement that designation would have little or no impact on mineral development is misleading; such consequences are correct only if it has been proven that no mineral resources are present.

Thank you for the opportunity to review the DEIS.

*William Cochran*  
William Cochran

1-93

RESPONSE TO LETTER 1-93

### Response 1

As stated in the U.S. Bureau of Mines report for Beaver Creek, development of the fluorspar is unlikely because of the low tonnage and grade, high mining costs, and lack of local market. It is also unlikely that the dolomite would ever be developed. This has been discussed in Chapter 3 of this FEIS.

Also the proposed action for the Beaver Creek WSA has been changed from Alternative D - Partial Wilderness Designation-II, to Alternative C - Partial Wilderness Designation-I, which includes the southwestern portion of the WSA in the portion recommended for wilderness.

Although there is potential for base and precious metals in the Sangre de Cristo mountains, field examination by BLM geologists has shown the entire Sand Castle WSA to have low mineral potential. This WSA has no mining claims and there has been no mineral interest expressed.

Wilderness designation would not impact the small scale mineral collecting which primarily occurs outside the Browns Canyon WSA. As discussed in Chapter 3, development of the perlite deposit on the northern edge of Browns Canyon is not expected because of the small size of the site and distance to a processing facility.

### Response 2

In a designated wilderness area, exploration and development would be allowed only on those claims that prove valid existing rights. These claims would be subject to the 43 CFR 3809 regulations and BLM Wilderness Management Policy.

### Response 3

The Affected Environment (Chapter 3) recognizes the potential for mineral development in areas where there are no presently discovered mineral resources. This potential has been taken into account in the analysis in Chapter 4.



IN REPLY REFER TO: LM-150

## United States Department of the Interior

BUREAU OF RECLAMATION  
REGIONAL OFFICE, LOWER MISSOURI REGION  
BUILDING 20, DENVER FEDERAL CENTER  
P.O. BOX 3507  
DENVER, COLORADO 80225

2-3

OCT 1 1982

### Memorandum

To: Project Manager, Bureau of Land Management, Royal Gorge Resource Area, P.O. Box 1470, Canon City, Colorado 81212  
From: ASSISTANT Regional Director  
Subject: Draft Environmental Impact Statement for Canon City District Wilderness Planning Amendment (DES 82-51)

We have completed our review of the above draft environmental impact statement and do not anticipate any conflict with Reclamation activities and facilities and have no comments.

*SM Wenden*

RESPONSE TO LETTER 2-3

Thank you for your letter.



IN REPLY REFER TO:

## United States Department of the Interior

FISH AND WILDLIFE SERVICE  
COLORADO FIELD OFFICE  
730 SIMMS STREET  
ROOM 202  
GOLDEN, COLORADO 80601

3-94

RESPONSE TO LETTER 3-94

### Response 1

In concurrence with Section 7 of the Endangered Species Act, the ELM has considered the impacts of all actions in this FEIS on threatened and endangered species. A discussion of threatened and endangered species is in Chapter 1.

February 28, 1986

### MEMORANDUM

To: District Manager, Bureau of Land Management  
Canon City District Office, Canon City, CO  
From: Assistant Field Supervisor, ES  
Lakewood Suboffice, Golden, CO  
Subject: Review of Draft Environmental Impact Statement for the Canon City District Management Framework Plan Wilderness Amendment

As requested in your memorandum of January 30, 1986, we have reviewed the document, subject as above, and offer the following comments for your use.

The Fish and Wildlife Service supports the preferred alternatives as identified in the document. It appears that the Sand Castle Area (CO-050-135) may be difficult to manage due to its small size. In addition, at the present time, the primary use in this area is hiking which results in minimal impacts to the area.

As you know, Section 7 of the Endangered Species Act requires that Federal agencies review their actions and determine whether Federally listed species will be affected. Consequently, ELM's WFF should not only discuss the occurrence or absence of Federally listed species, but should also assess the potential impacts that may occur to these species with implementation of the wilderness amendment. A "may affect" determination would require further consultation under Section 7 of the Endangered Species Act.

The opportunity to provide comments at this late date is greatly appreciated.

*Don A. Helling*

cc: FWS/HR, Denver  
FWS/ES, Salt Lake City  
FWS/SE, Grand Junction  
COWW, Denver, Attn: Don Smith



United States Department of the Interior

FISH AND WILDLIFE SERVICE

Fish and Wildlife Enhancement  
529 25<sup>th</sup> Road, Suite B-113  
Grand Junction, Colorado 81505

June 4, 1987



IN REPLY REFER TO:

MEMORANDUM

TO: District Manager, Bureau of Land Management, Canon City, CO

FROM: *for Robert [signature]*  
Acting State Supervisor, Fish and Wildlife Service, Fish  
and Wildlife Enhancement, Grand Junction, CO

SUBJECT: Wilderness Study Areas, Final Environmental Impact Statement

This responds to your May 15, 1987, letter regarding potential impacts to threatened and endangered species associated with the proposed wilderness designation.

Completion of the Environmental Impact Statement (Statement) itself will have no impact on endangered or threatened species. While the Statement may identify specific numbers of objectives, it is impossible through one consultation to render a "may affect" or "no effect" determination on all programs and activities that may be identified in the Statement. Thus, consultation will be required on a case-by-case basis prior to implementation of each specific action that, at that time, the Bureau of Land Management (Bureau) determines "may affect" any endangered species. If the determination is "may affect" for listed species, you must request in writing formal consultation from the Field Supervisor, Fish and Wildlife Enhancement, U.S. Fish and Wildlife Service, 2078 Administration Building, 1745 West 1700 South, Salt Lake City, Utah 84104. At this time you should provide this office a copy of the biological assessment and/or any other relevant information that assisted you in reaching your conclusion.

Due to the historic presence of peregrine falcons in the Beaver Creek Wilderness Study Area, we believe the final Statement should stipulate that the Peregrine Falcon Recovery Plan will be aggressively implemented. This would require, for example, the Bureau to discourage land-use practices and development which adversely alter or eliminate the character of the hunting habitat or prey base within 10 miles and the immediate habitats within 1 mile of the nesting cliff (task 1221, page 324). Denying any applications for surface occupancy or disturbance within the 10-mile radius would be evidence of aggressive implementation by the Bureau. While we recognize that such actions may not be possible in every case, at a minimum we would expect the Bureau to closely evaluate all such disturbances within the 10-mile radius and appropriately justify the "may affect" or "no effect" determination as required by section 7 of the Endangered Species Act.

4-97

We are including some suggested language for the Statement. We appreciate the opportunity to comment on the Statement. Please contact us if we may be of further assistance.

RESPONSE TO LETTER 4-97

Response 1

The Peregrine Falcon Recovery Plan, as referenced in the Chapter 1 discussion of Threatened and Endangered Species, will be implemented.

Response 2

This language has been incorporated into Chapter 1.

Attachment: Comments, Peregrine Falcon Recovery Plan

Threatened and Endangered Species

Bald eagles and peregrine falcons occur in some of the Wilderness Study Areas. Bald eagles occur as winter visitors and peregrine falcons have been known to occur in the Beaver Creek Wilderness Study Area.

Section 7 of the Endangered Species Act requires that the Bureau review the actions they may authorize, permit, or construct, and determine whether Federally listed species will be affected. If the Bureau determines that a particular action "may affect" a Federally listed species, formal consultation with the Fish and Wildlife Service must be requested. A "no effect" determination by the Bureau, concurred with by the Fish and Wildlife Service, concludes the Bureau's section 7 responsibilities. The Bureau will satisfy their responsibilities under the Endangered Species Act for each action that may potentially impact bald eagles or peregrine falcons residing within the Wilderness Study Areas.

Due to the likelihood that peregrine falcons may occur in the Beaver Creek Wilderness Study Area, the Bureau will implement the Peregrine Falcon Recovery Plan, as appropriate.

5-47

Form 1041-3  
July 1965  
(Renewal 4-1999)

UNITED STATES  
DEPARTMENT OF THE INTERIOR  
BUREAU OF LAND MANAGEMENT

## CONFIRMATION/REPORT OF TELEPHONE CONVERSATION

Name <i>Jack Albright (on hold)</i>	Name <i>Joyce J. S.</i>
Office <i>REGA</i>	Office <i>Regional Management Services</i>
Location <i>Casper, WY</i>	Location <i>Wapiti</i>
Telephone Number <i>303 275-7578</i>	Telephone Number <i>703 866-7531</i>

Purpose of Call:

To notify Jack Albright that they did not plan  
to send comments on the Wilderness EIS.

RESPONSE TO LETTER 5-47

Thank you for your letter.

Explanatory Remarks:

*Jack was in staff meeting.*

*Nov 29 1982*  
(Date) *8:40 am*

*E. James Goss*  
(Signature)

COLLATION COPY



# United States Department of the Interior

NATIONAL PARK SERVICE  
ROCKY MOUNTAIN REGIONAL OFFICE  
691 Puffer Street  
P.O. Box 12587  
Denver, Colorado 80225

IN REPLY REFER TO:  
L7619 (RGR-PC)  
XL48

DEC 9 1982

RESPONSE TO LETTER 6-74

## Memorandum

To: Project Manager, Royal Gorge Resource Area, Bureau of Land Management, Canon City, Colorado

From: Associate Regional Director, Planning and Resource Preservation, Rocky Mountain Region

Subject: Draft Environmental Impact Statement (EIS), Canon City District Wilderness Planning Amendment, Colorado (DES 82/51)

The National Park Service has reviewed the subject document. We support establishment of wilderness generally as enhancing the overall setting for units of the National Park System and recreational use.

The Sand Castle Wilderness Study Area (WSA) (CO-050-135) affects a unit of the National Park System since it abuts the Great Sand Dunes National Monument.

On Page 43, the WSA is described as being "east of the Sangre de Cristo Range;" this should be changed to "west." That same paragraph describes active sand dunes 600 to 800 feet high in the WSA; our experience is that these dunes are only 60 to 80 feet high.

On page 44 under Wilderness, a "way" is described as being on the east perimeter of the larger parcel; this should be changed to "west."

The same paragraph on page 44 describes a fence line on the northern border of the WSA. There is no mention, however, of the existing fence along the boundary of the national monument, between the monument and all the parcels of the WSA. This fence is to prevent cattle trespass into the monument. We wonder whether a fence might not also be appropriate to define the boundary of the WSA's if they were designated wilderness. We suggest that the final EIS discuss this possibility and its consequences, e.g., visual intrusion, as well as protecting the wilderness from back-country vehicle use.

The WSA is a remote and isolated area, and while the draft EIS states on page 74 that "a minor amount of four-wheel driving and dune buggy riding would be lost," there is no indication of how this might be enforced.

## Response 1

Thank you. These corrections have been made in the FEIS.

## Response 2

Although some back-country vehicle use occurs on this WSA, use levels are low and no noticeable impacts are occurring. In addition, no increase in this use is projected regardless of wilderness designation because of the existence of other areas more suited to such use. This use will continue to be difficult to restrict from either the existing Great Sand Dunes Wilderness or from an expanded wilderness area should the boundary be extended through designation of the WSA. In either case, this is largely an issue of manageability and not an environmental issue for analysis in this document. Consequently, it should more appropriately be addressed in the Great Sand Dunes Monument Management Plan or in a wilderness management plan for the WSA should it be designated.

6-74

## Response 3

Although a cooperative agreement has not been mentioned in the FEIS, it is expected that such an agreement would be developed should the area be designated wilderness.

2

You may wish to have the final EIS include the possibility of a cooperative agreement between the Bureau of Land Management and the National Park Service for management of the area if it were designated wilderness (under the authority of 16 U.S.C. 1717-1718). However, we hasten to point out that the National Park Service has not the resources to carry out such an agreement.

*Richard A. Strait*  
Richard A. Strait





# United States Department of the Interior

NATIONAL PARK SERVICE  
ROCKY MOUNTAIN REGIONAL OFFICE  
635 Parfet Street  
P.O. Box 22887  
Denver, Colorado 80225

IN REPLY REFER TO:

L7619 (RMR-PC)

APR 25 1983

RESPONSE TO LETTER 7-92

## Memorandum

To: Project Manager, Royal Gorge Resource Area, Bureau of Land Management, Canon City, Colorado

From: Associate Regional Director, Planning and Resource Preservation, Rocky Mountain Region

Subject: Further comments on the draft environmental impact statement (EIS), Canon City District Wilderness Planning Amendment, Colorado (DES 82/51)

We understand that shortly the Bureau of Land Management (BLM) will be forwarding a subject final EIS to Washington, D.C., for review. The National Park Service wishes to reiterate its comments on the draft EIS which were sent to you on December 3, 1982.

We are especially concerned about the proposal for designating the Sand Castle Wilderness, particularly the three southern parcels. We urge that the final EIS specifically deal with the management problems outlined in our December 3 memorandum. Some additional information has come to light since then. Our earlier memorandum calls attention to the need for enforcement against ORV use if the parcels are designated wilderness. We noted that the draft EIS considered there would be a "minor amount" of ORV use lost. We suggest that the final EIS recognize the difficulties of enforcing such a prohibition of use. The area is commonly used by local groups for ORV recreation. The staff at Great Sand Dunes National Monument has noticed such use of the WSA vicinity nearly every weekend over the past winter.

Another factor not brought out earlier is that some of the ORV use is for the purpose of collecting Indian artifacts from the bottom of sand "blowouts." This occurs both inside and outside the national monument and is another law enforcement factor to be considered in wilderness designation.

We continue to stress the need for fencing along the monument boundary to prevent trespass grazing. The final EIS should point out that the legislative history of P.L. 94-567, which established the Great Sand Dunes Wilderness, permits the National Park Service to use motorized vehicles within the wilderness to patrol the area and to maintain the boundary fence (Senate Committee Report 94-1357). The nature of the

## Response 1

See Response 2 to your previous letter number 6-74.

## Response 2

There are no known cultural resources within the WSA. In addition, we have no evidence that any portion of the WSA is being used for access to cultural sites within the National Monument. Further discussion on cultural resources is in Chapter 1.

## Response 3

Since no grazing occurs in the WSA, there is no need for a fence to control livestock use.

If the WSA were designated wilderness, a management plan would address motorized travel for administrative purposes. It could be possible to permit this limited use under the current wilderness management policy.

7-92

2

3 terrain may cause the patrol vehicle to cross into portions of the proposed Sand Castle wilderness.

We believe that having the final EIS point out the management problems outlined above and in our earlier memorandum will facilitate the job of the decisionmaker as to whether all or part of the Sand Castle WSA should be designated as wilderness.

  
Richard A. Strait



United States Department of the Interior  
NATIONAL PARK SERVICE  
GREAT SAND DUNES NATIONAL MONUMENT  
MORCA, COLORADO 81146

IN REPLY REFER TO:

May 12, 1987

Mr. Kenneth Smith  
Bureau of Land Management  
P.O. Box 311  
Gannon City, CO 81212

Dear Mr. Smith:

In response to your telephone inquiry, we offer the following information. The strategy utilized in the Preliminary Resource Assessment of the Sand Castle unit was based on two "key questions." These questions were:

1. "Do the lands possess significant scenic, scientific, cultural, and recreational values that importantly supplement or complement those within the current park boundary?" and
2. "Do the lands fill a management or administrative need for resource protection or public use?"

In response to these "key questions" in conducting the preliminary assessment, the evaluation team relied, to a degree, on information contained in various BLM documents as well as an on-the-ground survey of the Sand Castle unit.

In conclusion, the Sand Castle unit was judged to be insignificant based on the criteria earlier identified. The Preliminary Resource Assessment points out that the Sand Castle unit would neither add to nor subtract from the scenic, scientific, cultural and recreational values of the monument.

Sincerely,

*Robert C. Reyes*  
Robert C. Reyes  
Superintendent

RESPONSE TO LETTER 8-96

Response 1

We appreciate the information the National Park Service has provided. This is of particular importance since the Sand Castle WSA is contiguous to the Great Sand Dunes Wilderness and is too small (1,644 acres) to be considered for wilderness by itself.

9-98



United States Department of the Interior  
NATIONAL PARK SERVICE  
ROCKY MOUNTAIN REGIONAL OFFICE  
645-655 Park Street  
P.O. Box 2237  
Denver, Colorado 80228

IN REPLY REFER TO:

D18 (RMS-TP)

JUN 1987

Memorandum

To: State Director, Colorado State Office, Bureau of Land Management, Denver, Colorado

From: Regional Director, Rocky Mountain Region

Subject: Sand Castle Wilderness Study Area, Canyon City District

As a result of several recent inquiries, there appears to be some confusion as to what the National Park Service's position is relative to the four units which constitute the Sand Castle Wilderness Study Area (CO-050-135) adjacent to Great Sand Dunes National Monument in Colorado.

In our December 3, 1982, and April 25, 1983, comments on the draft Environmental Impact Statement (EIS) Wilderness Planning Amendment, we supported Bureau of Land Management's proposal to establish wilderness within the Sand Castle Unit and indicated such designation would complement the overall setting of Great Sand Dunes National Monument. The latter referenced memorandum pointed out several difficulties of enforcing certain prohibitions against use that currently exist; however, this did not change our opinion that wilderness designation would complement Great Sand Dunes National Monument values. As per this memorandum, we wish to make it clear that the National Park Service would welcome wilderness designation in the Sand Castle Units.

Based on our recent conversation with the Bureau of Land Management, Canyon City District, it is our understanding that Bureau of Land Management proposes to change their position and recommend the area be dropped from further consideration as wilderness. Should this be the final decision, we recommend that the final EIS reflect the Bureau of Land Management would closely coordinate the management and administration of the units with the National Park Service so as not to impact park resources and visitor use and enjoyment of Great Sand Dunes National Monument. Our comments would obviously include any activities that would result in a contrast with the wilderness values within the monument.

We also wish to take this opportunity to clear any confusion surrounding the National Park Service Resource Assessment of the Sand Castle Units conducted in 1984. The assessments were conducted as a result of Congressman John Seiberling's Bill (H.R. 1214) and request on the National Park Service to evaluate the Sand Castle Unit for possible addition to Great Sand Dunes National Monument. Since the Bill had nothing to do with wilderness, we evaluated the units simply as a potential addition to the park. The results of the Resource Assessment concluded that the units were insignificant based on National Park Service criteria; therefore, the units were dropped from

RESPONSE TO LETTER 9-98

Response 1

Any future actions that may impact adjacent land would be closely coordinated with the landowner, or in this case the Park Service.

further consideration. The 1984 Resource Assessments should in no way effect the Bureau of Land Management's assessment of the units for wilderness consideration, nor should the results of the assessment be interpreted as the National Park Service being opposed to wilderness designation in the Sand Castle Units.

We hope this resolves any confusion that might exist concerning this matter. Should you have any questions, please contact Mr. Wayne Gardner, Division of Planning and Compliance at FTS 776-8688 or commercial 303-236-8688.

*Lorraine Mintzinger*

cc:  
Supt., Great Sand Dunes NM  
Project Manager, Royal Gorge Resource Area,  
Bureau of Land Management, Canyon City, CO  
Mr. Kirk Kaepsel  
Colorado Env. Coalition, Denver, CO  
Bob Stewart, Office of Env. Policy Review  
Denver, Colorado

10-1



United States  
Department of  
Agriculture

Forest Service Pike & San Isabel National Forests  
1920 Valley Drive, Pueblo, CO 81008

Reply to 1920 Land & Resource Management Planning

Date SEP 16 1982

Re DEIS Wilderness Planning Amendment

To Jack Albright, Project Manager  
Bureau of Land Management  
Royal Gorge Resource Area  
P. O. Box 1470  
Canon City, CO 81212

RESPONSE TO LETTER 10-1

Thank you for your letter.

We have no comments on subject environmental impact statement.

*Edward A. Morgan*  
/s/ EDUARD A. MORGAN  
Forest Supervisor

UNITED STATES DEPARTMENT OF AGRICULTURE  
FOREST SERVICE

Rio Grande National Forest  
1803 West Highway 160  
Monte Vista, CO 81144

October 12, 1982

1920  
(2320)



Mr. Jack Albright, Project Manager  
Bureau of Land Management  
Royal Gorge Resource Area  
P.O. Box 1470  
Canon City, CO 81212

RESPONSE TO LETTER 11-11

Thank you for your letter.

Dear Jack:

My Staff and I have reviewed your Draft Environmental Impact Statement for the Canon City District Wilderness Planning Amendment. Sand Castle and San Luis Hills are the only Wilderness Study Areas in the San Luis Valley and neither of these areas are adjacent to the Rio Grande National Forest. Access to or through these areas will not affect National Forest management.

You are probably aware that through a cooperative agreement, we have fire control responsibility on all BLM land in the San Luis Valley. There is no history of any fire occurrence in the Sand Castle or San Luis Hills areas. Your preferred alternative should not affect fire control in these areas.

Thank you for the opportunity to comment on your Wilderness Planning Amendment.

Sincerely,

*George W. Whitlock Jr.*  
GEORGE W. WHITLOCK JR.  
Forest Supervisor

12-2

DEPARTMENT OF THE AIR FORCE  
AIR FORCE REGIONAL CIVIL ENGINEER CENTRAL REGION (AFESC)  
1114 COMMERCE STREET  
DALLAS TEXAS 75242



24 September 1982

RESPONSE TO LETTER 12-2

Response 1

Mr. Jack Albright, Project Manager  
Bureau of Land Management  
Royal Gorge Resource Area  
P O Box 1470  
Canon City, Colorado 81212

Dear Mr. Albright

Thank you for allowing us the opportunity to review the Canon City District Wilderness Planning Amendment for the seven Wilderness Study Areas (WSAs) in Colorado.

As in previous correspondence with BLM, we continue to express our support of BLM efforts in inventorying the public lands for wilderness potential. The Air Force position on wilderness issues remains the concern to retain use of existing and the establishment of future military flight training areas and routes which may traverse these areas.

Current Air Force operations in the Canon City District includes an Instrumentation Training Route crossing the Sangre De Cristo Range just east of Salida and proceeding to La Veta Pass southward toward Huerfano Valley. Although flight training areas, routes, and airspace requirements of the military are subject to change and do change frequently, it is not anticipated that the referenced route will be altered in the immediate future.

Mission requirements, fuel costs and environmental constraints determine the decision to locate a military training activity. Because of general aviation and population pressures, low level high speed flights are relegated to areas which are least accessible and sparsely inhabited. Therefore, we request that you give full consideration to how planning and management decisions made by your agency may adversely affect or restrict use of low altitude airspace by the Air Force. The Air Force position on this matter is based on the high training and readiness values rendered by use of this low altitude airspace. Decisions to restrict military overflights will be opposed by the Air Force.

We are hopeful this information is useful in your planning. If additional information is needed, our staff point of contact is Mr. Raymond Bruntzmyer, (214) 767-2514, or FTS 729-2514.

Sincerely

*Joe C. La Foy, Jr.*  
JOE C. LA FOY, JR., Lt Colonel, USAF  
Chief, Environmental Planning Division

Cy to: AF/LEEC  
AFREP/FAA Northwest  
Mountain Region

5-12



## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VIII

RESPONSE TO LETTER 13-86

OFFICE  
Ref: BPN-EA

1850 LINCOLN STREET  
DENVER, COLORADO 80255-0599

Jack Albright  
Project Manager, BLM  
Royal Gorge Resource Area  
P.O. Box 1470  
Canon City, Colorado 81212

Dear Mr. Albright:

The Region VIII Office of the Environmental Protection Agency has completed its review of the draft Wilderness environmental impact statement for the Canon City District and offers the following comments for your consideration. The organization, format, and writing style of the DEIS are very clear and helpful. The maps and graphics combined with the systematic presentation of each alternative makes it easy for the reader to understand and compare the alternatives.

One of our primary interests relative to Wilderness designation relates to the various ways in which such designation can affect water quality. We often see wilderness designations as one approach toward protecting the water quality of municipal water supplies, significant fisheries and other downstream uses. Generally your Water Section under each alternative adequately addressed those issues.

Additional air quality information would have been appropriate to include in the DEIS. There was no discussion relative to monitoring from such sources as the power plant next to the Beaver Creek WSA. Would the power plant impact the wilderness qualities of the study area? If the state eventually desired to reclassify the Beaver Creek WSA to a more stringent Class I designation, would such a redesignation even be possible given the proximity of the power plant, the prevailing winds and topography? If it were possible, how would such a redesignation affect the operations and plans of the power plant? It occurs to us that redesignation would have serious ramifications for the City of Colorado Springs power plant operations. We would suggest that the FEIS seriously consider the financial impacts on neighboring facilities.

According to the system EPA uses to rate draft EIS's, the Canon City District wilderness draft EIS will be listed in the Federal Register as LO-2. This means that we have no objections to the proposed action as presented in the draft EIS, however some additional air quality discussion should be included in the final EIS. If you have any questions regarding our comments, please contact Dennis Schockel at FFS 327-4831.

Sincerely yours,

*Steven J. Durhan*  
Steven J. Durhan  
Regional Administrator



## Colorado Department of Corrections

6385 North Academy Boulevard  
Colorado Springs, Colorado 80907  
Telephone: (303) 598-0729



14-7

Richard D. Lamm  
Governor

James G. Richards, Ph.D.  
Executive Director

October 15, 1982

Mr. Jack D. Albright  
Area Manager  
Bureau of Land Management  
P.O. Box 1470  
Canon City, Colorado 81212

Dear Mr. Albright:

I was advised that there are current plans by the Bureau of Land Management to restrict any type of motorized vehicle in the Brown's Canyon area. Although I believe this is an issue to be addressed based on the merits of your investigation, I wish to advise that there are frequent cases when, in the public interest, I pursue escapees through that area. Because of the geographics it has become a natural route of escape once inmates unlawfully remove themselves from this institution. It has been my experience that it is necessary to use motor vehicles in the Brown's Canyon area to apprehend these individuals.

I respectfully request that you make some provision for us to continue to do that after you designate the area for public use.

Sincerely,

*Warren T. Diezlin*  
Warren T. Diezlin  
Superintendent

WTD:ll

Response 1

The air quality in the Beaver Creek WSA is presently designated Class II under the Federal Clean Air Act. The designation of an area as wilderness does not change the air quality standards for that area. A recommendation for wilderness designation is not a recommendation for stringent air pollution controls.

If this WSA is designated wilderness by Congress, nothing would necessitate a reclassification to Class I. The BLM Wilderness Study Policy states, "The Department of the Interior will not recommend reclassification to the more strict Class I in connection with future wilderness recommendations . . . air quality reclassification is the prerogative of the states. . . ." Such a decision would be made by the state of Colorado, not BLM.

Therefore, the potential for redesignation is independent of wilderness status of the area.

RESPONSE TO LETTER 14-7

Response 1

This would be addressed in a wilderness management plan if the WSA is designated. Provisions are in the Wilderness Management Policy to allow for motorized travel in these situations.

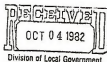




COLORADO  
HISTORICAL  
SOCIETY

The Colorado Heritage Center 1300 Broadway Denver, Colorado 80203

September 27, 1982



Mr. Stephen O. Ellis  
Principal Planner  
A-95 Clearinghouse  
323 State Centennial Building  
1313 Sherman Street  
Denver, Colorado 80203

RE: Canon City District Wilderness Amendment Draft EIS-BLM  
#82-117

Dear Mr. Ellis:

The designation of land as a wilderness area on the one hand restricts access to the land by the use of motorized vehicles and restricts land disturbing activities, but on the other hand probably increases visitor use. The possibility exists that vandalism of cultural resources could increase due to the increased activity. This office suggests that the Bureau of Land Management provide for a monitor to periodically check known cultural resources within the areas under consideration for wilderness designation. In the event that vandalism increases, a cultural resource survey should then be conducted in those areas of high visitor use within each study area. A mitigation plan would then be formulated in consultation with this office to deal with the impacts to any eligible resources.

If this office can be of further assistance, please contact the Compliance Division at 866-3392.

Sincerely,

Arthur C. Townsend  
State Historic Preservation Officer

ACT/WJC:ss



COLORADO  
HISTORICAL  
SOCIETY

Colorado State Museum 1300 Broadway Denver, Colorado 80203

16-95

RESPONSE TO LETTER 16-95

Response 1

Thank you for your letter. We have included this language in Chapter 1.

March 23, 1987

Mr. Neil Morck  
State Director  
Bureau of Land Management  
2850 Youngfield Street  
Lakewood, Colorado 80215

Dear Mr. Morck:

Thank you for sending us a copy of your proposed language for Wilderness Environmental Impact Statements. This standard language should be appropriate for most upcoming EIS's where the likelihood of having significant cultural resource values is low.

You and your staff deserve congratulations for developing such a useful and comprehensive approach to a sensitive national issue. I can only hope other agencies will follow your lead.

Sincerely,

Leslie E. Willesen, Ph.D.  
Deputy State Historic Preservation Officer

LEWing



## COLORADO NATURAL HERITAGE INVENTORY

1550 Lincoln Street, Room 110 Denver, Colorado 80202

DATE: 19 November 1982

TO: Stephen O. Ellis

FROM: Colorado Natural Heritage Inventory

CC: C. Pustmüller  
S. BissellDATA PERTAINING TO: Canon City District Wilderness Amendment Draft EIS  
#B2-117

## BEAVER CREEK WSA

Special Animals

Desert shrew (Notiosorex crawfordi) - Special Concern Species: about 10 widely distributed records from Colorado in the southeast and southwest portion of the state. Several collections of this species were made along Eightmile Creek in Phantom Canyon in T 17S, R69W, S 22, 2B, 32, 22 and T1B5, R69W, S4. This species is not well-known in Colorado, but may be more common than the records indicate. The study in Phantom Canyon is one of the more comprehensive ones from the entire range of this species. The preferred Alternate D would exclude this portion of land from Beaver Creek WSA.

Night snake (Hypsiglena torquata) - Special Concern Species: distribution similar to the desert shrew, with about 12 localities of one subspecies in the southeastern portion of Colorado and 3 locations of the second subspecies in western Colorado. The closest known record of this species to this WSA is Brush Hollow Reservoir, about 5 miles south.

## SAND CASTLE WSA

Special Animals

Tiger beetle (Cicindela theutina) - Special Concern Species, to be included on the Invertebrate Notice of Review soon to be published in the Federal Register. This species, known only from Great Sand Dunes National Monument and its vicinity, occurs in patches of Indian rice grass scattered across the dunes. It has been collected within this proposed WSA.

17-65

RESPONSE TO LETTER 17-65

SPECIAL PLANTS

P. 28: Approximately two miles southwest of the Browns Canyon WSA is one of the two localities of Eriogonum brandegei (USFWS Category 2) known in the world. The possibility exists that this taxon could occur within the WSA.

P. 33: The Mc Intyre Hills WSA contains a known occurrence of Penstemon degeneri, a USFWS Category 2 plant taxon. One of four population centers known to exist in the world.

P. 34: A known locality for P. degeneri occurs adjacent to the Lower Grape Creek WSA. The possibility exists that this taxon could occur within the WSA.

P. 38: Information from a botanical specimen indicates that Bolophytia tetraeuris (USFWS Category 2) occurs within the the Beaver Creek WSA.

These and other taxa of concern have the possibility of occurring in the WSA's. If specific occurrence or other data are desired, please contact us.

Response 1

The document has been changed to recognize the occurrence and/or potential occurrence of the following FWS Category 2 plant taxa:

- McIntyre Hills WSA, Penstemon degeneri is known to occur. This species may also occur in the Lower and Upper Grape Creek WSAs; however, further field inventories would have to be conducted to verify this.
- Beaver Creek WSA, Bolophytia tetraeuris is known to occur.
- Browns Canyon WSA, Eriogonum brandegei occurs adjacent to this WSA and potentially could occur in the WSA.

The above information has been incorporated into the Chapter 1, discussion of T&E species.

18-67

## STATE OF COLORADO

## DEPARTMENT OF HIGHWAYS

4201 East Arkansas Ave  
Denver, Colorado 80222  
(303) 137-9011



November 18, 1982

Mr. Stephen O. Ellis  
State Clearinghouse  
520 State Centennial Building  
1313 Sherman Street  
Denver, Colorado 80203

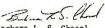
Dear Mr. Ellis:

The Colorado Department of Highways has completed its review of the Draft Environmental Impact Statement for the Canon City District Wilderness Amendment and has no comments.

Thank you for the opportunity to review this document.

Very truly yours,

Harvey R. Atchison  
Director  
Division of Transportation Planning

By   
Barbara L. S. Chocel  
Manager  
Project Development Branch

REG/eg

RESPONSE TO LETTER 18-67

Thank you for your letter.

19-63

## STATE OF COLORADO

Department of Local Affairs

## DIVISION OF LOCAL GOVERNMENT

Pat Rathell, Director



Richard D. Carr  
Governor

December 3, 1982

Area Manager  
Canon City District Office  
Bureau of Land Management  
P. O. Box 1470  
Canon City, Colorado 81212

SUBJECT: Draft Environmental Impact Statement  
Canon City District Wilderness Planning Amendment

Dear Sir:

The Colorado Clearinghouse has received the above-referenced Draft Environmental Impact Statement and has distributed it to interested state agencies. Comments received from Colorado Division of Wildlife, Colorado Natural Heritage Inventory, Colorado Historical Society, Colorado Department of Highways, and the Colorado Division of Water Resources are enclosed for your information. A comment from the Colorado Natural Areas Program will be sent when it is received by the Clearinghouse office.

Thank you for the opportunity to review this matter.

Sincerely,

Stephen O. Ellis  
Chief Planner

SR/PN/vt  
Enclosures

cc: Office of the Governor  
Department of Natural Resources  
Colorado Historical Society  
Department of Highways

RESPONSE TO LETTER 19-63

Thank you for your letter.

20-77  
STATE OF COLORADO  
Department of Local Affairs



Richard D. Lamm  
Governor

DIVISION OF LOCAL GOVERNMENT

Pat Raloff, Director

RESPONSE TO LETTER 20-77

Thank you for your letter.

MEMORANDUM

TO: BUREAU OF LAND MANAGEMENT  
Attn: Area Manager

FROM: Stephen D. Ellis  
State Clearinghouse

SUBJECT: ADDITIONAL COMMENTS  
Canon City District Wilderness Planning Amendment  
Draft Environmental Impact Statement

DATE: December 6, 1982

The enclosed comments on the above-referenced proposal have just been received from the following:

Colorado Natural Areas Program

Please consider this transmittal as an official addition to the comments which I sent to you earlier. We regret this late transmittal, and hope that these comments can still be given consideration.

Thank you for your attention.

SE/vc  
Enclosure

20-77

STATE OF COLORADO

COLORADO NATURAL AREAS PROGRAM  
Department of Natural Resources  
111 Sherman Street, Room 118  
Denver, Colorado 80202  
1466  
Phone (303) 869-1117



Richard D. Lamm  
Governor  
D. Wayne Rouse  
Executive Director  
Candis P. Thompson, Ph.D.  
Program Director

December 3, 1982

Mr. Jack Albright, Manager  
Bowl Grove Resource Area  
Bureau of Land Management  
P.O. Box 1470  
Canon City, Colorado 81212

Dear Jack:

I appreciate the opportunity to comment on the Canon City District Wilderness Planning Amendment Draft Environmental Impact Statement and request that you consider the following comments.

BLM should be commended for its identification and recognition of the outstanding wilderness qualities of Beaver Creek and Brown's Canyon. However, BLM's preferred alternatives in the DEIS exclude three other highly qualified wilderness areas: Upper Grape Creek, Lower Grape Creek and San Luis Hills.

Specific comments on each area follow:

1. **Beaver Creek:** Favor Alternative C and oppose BLM's Preferred Alternative D. We do not support the deletion of the 4,000 acres south of the Holbert drainage. The DEIS states that this 4,000 acres is excluded because of a firewood harvest project which "could result in a loss of some primitive and unconfined recreation, solitude and naturalness due to associated surface disturbing activities such as road building" (Page 69). This country is extremely rugged, making access to the firewood in the area difficult. The back packing, wildlife, and other wilderness values of this area outweigh the firewood value of the area.

The Beaver Creek Area was first identified to the Colorado Natural Areas Program as a potential State Natural Area in March, 1978 by Eric Kelly, Jr., who was appointed by Governor Richard Lamm to serve on the Colorado Natural Areas Council in 1977 and was reappointed in 1979 for a four year term. Furthermore, the entire Natural Areas Council has also visited the site. Further consideration of this site as a natural area was postponed pending first, final negotiations between the BLM and the Colorado Division of Wildlife, and later, decisions on the Wilderness Study Area.

5-17

Mr. Jack Albright  
December 3, 1982

Page Two

Inclusion of the 20,750 acres in Alternative C into the National Wilderness Preservation System will provide a quality wilderness area having ecological and geological qualities not found in the existing Wilderness Areas anywhere in the United States.

2. Brown's Canyon: Favor BLM Preferred Alternative for Brown's Canyon. The 6,614 acres of this unit is too rugged to make timber and minerals production economical.
3. Sand Castle: Favor BLM Preferred Alternative for Sand Castle of 1,644 acres in 4 parcels contiguous to Grant Sand Dunes Wilderness Area.
4. Upper and Lower Grape Creek: Favor Alternative D (Partial Wilderness Designation - II) for both Upper and Lower Grape Creek. BLM staff at the State briefing commented that this Alternative for these units would not leave a manageable unit. "Management" in a Wilderness Area should be negligible if the area became a designated Wilderness Area.
5. San Luis Hills: Favor Alternative D and Oppose BLM Preferred Alternative. The ecosystems found in this unit would provide a wilderness experience not typical of the existing designated Wilderness Areas in the United States.
6. McIntyre Hills: Favor BLM Preferred Alternative for non-wilderness recommendation for entire 16,800 acres.

I also call your attention to comments submitted by the Colorado Natural Heritage Inventory. The inventory is operated by The Nature Conservancy under a contract with the Colorado Natural Areas Program. All data in the inventory are the property of the Colorado Natural Areas Program, Colorado Department of Natural Resources.

If you have any questions on these comments, please contact me. Thank you.

Sincerely,

*Carne*

Carne Postmuller, Ph.D.  
Director  
Colorado Natural Areas Program

21-80

STATE OF COLORADO

Department of Local Affairs



Richard D. Lamm  
Governor

DIVISION OF LOCAL GOVERNMENT

Pat Ratliff, Director

M E M O R A N D U M

RESPONSE TO LETTER 21-80

Thank you for your letter.

TO: BUREAU OF LAND MANAGEMENT  
Attn: Jack Albright

FROM: Stephen O. Ellis  
State Clearinghouse

SUBJECT: ADDITIONAL COMMENTS  
Canon City District Wilderness Planning Amendment  
Draft Environmental Impact Statement

DATE: December 7, 1982

The enclosed comments on the above-referenced proposal have just been received from the following:

Colorado Department of Natural Resources

Please consider this transmittal as an official addition to the comments which I sent to you earlier. We regret this late transmittal, and hope that these comments can still be given consideration.

Thank you for your attention.

SE/vc  
Enclosure



STATE OF COLORADO RICHARD O. LAMM, Governor  
DEPARTMENT OF NATURAL RESOURCES

D. MONTE PASCOE, Executive Director  
1313 Sherman St., Room 218, Denver, Colorado 80203 866 3311



Biological Sur  
Board of Land Commissioners  
Mineral Land Reclamation  
Division of Mines  
Oil and Gas Conservation Commission  
Division of Parks & Outdoor Recreation  
Soil Conservation Board  
Water Conservation Board  
Division of Water Resources  
Division of Wildlife

21-80

December 6, 1982

Mr. Jack Albright, Project Manager  
Bureau of Land Management  
Royal Gorge Resource Area  
Post Office Box 1470  
Canon City, Colorado 81212

Dear Mr. Albright:

We have reviewed the BLM proposals for wilderness recommendations in the Canon City District. The preferred alternative strikes a generally reasonable balance. We support the designation of the Brown's and Sand Castle areas.

With regard to Beaver Creek, we recommend that the BLM give serious consideration to inclusion of the 4000 acres south of the Holbert drainage, as well as the 17,000 acres included in the preferred alternative. This area appears to have significant wilderness values, and a relatively small acreage of harvestable timber would be affected.

Sincerely yours,

*Monte Pascoe*  
Monte Pascoe  
Executive Director

DMP:bck

22-51  
STATE OF COLORADO

Division of Parks & Outdoor Recreation

1313 Sherman Street, Rm. 618  
Denver, Colorado 80203  
Phone (303) 839-3437



Richard O. Lamm,  
Governor  
D. Monte Pascoe,  
Executive Director  
George T. O'Malley, Jr.,  
Director  
Colorado Board of Parks  
and Outdoor Recreation  
Richard G. Biederman,  
Chairman  
Phil Eggleston,  
Vice Chairman  
Hubert A. Faden, Jr.,  
Secretary  
Teresa J. Taylor,  
Member  
Richard S. Bartlett,  
Member

November 29, 1982

Jack Albright, Project Manager  
Bureau of Land Management  
Royal Gorge Resource Area  
P.O. Box 1470  
Canon City, Colorado 81212

Dear Mr. Albright:

The draft E.I.S. of the wilderness planning amendment for the Canon City district is concise and well written for the breadth of the areas covered.

The SCORP needs information shows that motorized as well as non-motorized recreation is needed in the State Planning Regions included in the Canon City district. The E.I.S. preferred alternatives provide for a range of both motorized and non-motorized back country opportunities and make for a balanced approach to meeting outdoor recreation needs.

We concur with the BLM preferred alternatives for the wilderness study areas for the Canon City district wilderness planning amendment.

Sincerely,

*George T. O'Malley, Jr.*  
George T. O'Malley, Jr.  
Director

GTO:JC:nb  
cc: Dewitt John

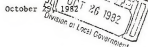
RESPONSE TO LETTER 22-51

Thank you for your letter.



OFFICE OF THE STATE ENGINEER  
DIVISION OF WATER RESOURCES

1313 Sherman Street, Suite 112  
Denver, Colorado 80202  
(303) 856-2555



MEMORANDUM

TO: Pete Meseth, State Clearinghouse  
FROM: Hal D. Simpson, Assistant State Engineer  
SUBJECT: Canon City District Wilderness Amendment Draft Environmental Impact Statement (DEIS)

RESPONSE TO LETTER 23-68

Thank you for your letter.

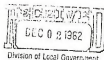
Thank you for allowing us the opportunity to review the above referenced DEIS. We have no specific comments or objections concerning the DEIS.

HDS/JRH:ma

OF COLORADO  
Richard D. Lamm, Governor  
DEPARTMENT OF NATURAL RESOURCES  
DIVISION OF WILDLIFE  
Jack R. Grieb, Director  
6060 Broadway  
Denver, Colorado 80226 (303-733-1192)



MEMORANDUM



TO: Pete Meseth  
FROM: Don Smith  
SUBJECT: Canon City District Wilderness Amendment Draft EIS  
DATE: December 1, 1982

RESPONSE TO LETTER 24-64

Response 1

Additions or changes have been made in the appropriate sections of the FEIS.

The Division of Wildlife has reviewed the subject document and supports the preferred alternatives. However, we do question the practicality of recommending the Sand Castle Area (CO-050-135) for wilderness designation because of its small size and difficulty to manage. The present use is primarily hiking and damage is minimal.

In general, the wildlife data is acceptable although we believe the potential losses to wildlife resulting from wilderness designation is high. We also feel that further restriction of vehicle access will not be significant because many of the areas around Canon City area is already restricted by legal access and topography. Our specific comments follow:

Page	Paragraph	Comment
7	7	Give the percent of the district which 87,778 acres containing wilderness values represent.
19-24	Table II-2	This should be consistent with Table II-1 (p. 11) where Alternatives C and D were designated N/A because they were not evaluated.  Alternative C would never be the same as Alternative A because some area would be available for development. The differences may be negligible but if so, say it. The same applies to Alternative D.
21	Wildf.	Convent should be changed to displace in referring to standing fish crops throughout the report.
24	Wildf.	The potential losses of wildlife under the three alternatives should be detailed to be consistent. Again, Alternative C would not be the same as Alternative A.

Pete Naseth  
Page 2  
December 1, 1982

	Page	Paragraph	Comment
2	27	3	Define MSA.
	78	6	Alternative C should also address wildlife impacts.
3	79	1	The impact to existing wildlife and habitat should be defined under no wilderness designation. Mineral development in particular would be adverse.
	96		Nongame fish should be defined in the glossary.

We appreciate the time given for review and compliment the District on the easily digested format.

ag

cc: Dewitt John

### Response 2

MSA is defined in the Glossary.

### Response 3

Additions or changes have been made in Chapter 4 and the Glossary.

25-18



Center Soil Conservation District  
P O Box 8 Canon, Colorado 81225 Phone (303) 754 3422 3471

October 26, 1982

Bureau of Land Management  
Canon City Regional Office  
1080 Main  
Canon City, CO 81212

To Whom It May Concern:

The Center Soil Conservation District has reviewed the current EIS covering wilderness designations in the Canon City region. We are particularly interested in the Sand Castle Management Area, which is located within our conservation district.

After reviewing the three alternatives listed, the district would prefer Alternative B, the no change alternative. If a wilderness area is necessary, we would recommend the isolated 160 acre parcel north of the Great Sand Dunes National Park for wilderness designation. This parcel could then act as a buffer between the park and the Baca Grande Development.

If any further evaluations are completed concerning the Sand Castle M.A., we would appreciate the chance to review this material.

Sincerely,

  
Steve Tonso, President  
Center Soil Conservation District

ST/jmr

### RESPONSE TO LETTER 25-18

Thank you for your letter.



CITY OF COLORADO SPRINGS  
The "America the Beautiful" City  
OFFICE OF THE MAYOR  
P.O. BOX 1575 COLORADO SPRINGS  
November 1, 1982

26-23

ROBERT M. ISAAC  
MAYOR

TEL. (303) 578-6600

Jack Albright, Project Manager  
Bureau of Land Management  
Royal Gorge Resource Area  
P. O. Box 1470  
Canon City, CO 81212

Dear Mr. Albright:

This letter is in response to your request for comments relative to the Draft BLM Environmental Impact Statement on proposed wilderness areas. In addition to this letter, technical comments concerning the adequacy of the EIS are forthcoming.

Should Congress adopt the BLM proposal for designating Beaver Creek as a wilderness area, new emission sources in the Colorado Springs area could then be subject to an additional section of the Clean Air Act. These federal requirements are intended to establish pristine air quality within wilderness areas and, as interpreted by a few, to create uninterrupted vistas extending beyond the wilderness boundaries. Colorado Springs is not yet convinced that such controls best serve the public interest when applied to areas such as Beaver Creek. The cost to our electric ratepayer would be significant.

It is unfortunate that the potential application of federal visibility authority forces the City into a position of concern for a wilderness designation that would otherwise be supportable. Upcoming amendments to the federal Clean Air Act will more than likely include changes to the visibility program. As proposed, some changes would intensify our concerns while other proposals would probably eliminate our concern for the Beaver Creek designation. For this reason Colorado Springs hereby suspends judgment on the potential impact of the proposed wilderness designation until the issue of Congress concerning visibility is clarified. We expect this clarification prior to Congressional consideration of the BLM Wilderness proposals.

I hope you find these comments helpful. If you have questions please contact me.

Sincerely,

*Robert M. Isaac*

Robert M. Isaac  
Mayor

aps  
cc: City Council  
Congressional Delegation  
FRACG

RESPONSE TO LETTER 26-23

Response 1

The air quality in the Beaver Creek WSA is presently designated Class II under the Federal Clean Air Act. The designation of an area as wilderness does not change the air quality standards for that area. A recommendation for wilderness designation is not a recommendation for stringent air pollution controls. If this WSA is designated wilderness by Congress, nothing would necessitate a reclassification to Class I. The BLM Wilderness Study Policy states, "The Department of the Interior will not recommend reclassification to the more strict Class I in connection with future wilderness recommendations . . . air quality reclassification is the prerogative of the states. . . ." Such a decision would be made by the state of Colorado, not BLM. Therefore, the potential for redesignation is independent of wilderness status of the area.

27-36

RESPONSE TO LETTER 27-36

Response 1

Based on state and Federal ambient air quality data, 11 areas in the RGRA were identified by the BLM resource staff as "areas of high air quality." Some of the basic resource factors considered were: ". . . 1. remoteness, 2. high altitude, 3. inaccessability, . . ."

The northern portion of the Beaver Creek unit was one of the above mentioned "areas of high air quality." Inadvertently it was shown that the State Air Pollution Control division has identified these areas instead of the BLM resource staff. This statement has been omitted in the FEIS.

UTILITIES BUILDING  
16 S. NEVADA AVE

CITY OF COLORADO SPRINGS  
COLORADO 80907  
P. O. BOX 1463  
DEPARTMENT OF PUBLIC UTILITIES  
WATER ELECTRIC GAS WASTE WATER

November 16, 1982

Mr. Ken Smith, Wilderness Specialist  
Bureau of Land Management  
Royal Gorge Resource Area  
P. O. Box 1470  
Canon City, CO 81212

Dear Ken:

I am writing this letter to suggest that you contact Jim Leno, Director of the Air Pollution Control Division at the Colorado Department of Health. My concern stems from the discussion of air quality in Beaver Creek Wilderness Study Area in your Draft Environmental Impact Statement.

It was stated the air quality in the northern portion of this area is pristine. I have been unable to find the source for this statement and the Air Pollution Control Division has no record of air quality determination for the northern portion of Beaver Creek. If there is detailed air quality data to justify the statement, I feel it should be identified, analyzed and summarized in the Environmental Impact Statement.

Additionally, since air quality necessarily involves a state agency, I feel that the State's position should be solicited in order to make your EIS more complete.

Lack of this information in the EIS, particularly in light of the generalized statements as to air quality, reflect on the document's adequacy. If I can be of any assistance please let me know.

Very truly yours,

*Paul*  
R. F. KIRKBRICH  
Senior Resource Planner

5-22



CITY OF COLORADO SPRINGS

The "America the Beautiful" City

OFFICE OF THE MAYOR

P.O. BOX 1575 COLORADO 80901

December 6, 1982

ROBERT M. ISAAC  
MAYOR

28-69

TEL (303) 578-6600

Jack Albright  
Project Manager  
Bureau of Land Management  
Royal Gorge Resource Area  
P. O. Box 1470  
Canon City, CO 81212

Dear Mr. Albright:

Enclosed are the comments of the City of Colorado Springs to the Draft Environmental Impact Statement on the Wilderness Planning Amendment for the Canon City District.

Should you have any questions regarding this document or wish further elaboration on any of the points raised, please feel free to contact me or my staff.

Sincerely,

  
Robert M. Isaac  
Mayor

aps  
enclosure

28-69

COMMENTS OF THE CITY OF COLORADO SPRINGS  
TO THE BUREAU OF LAND MANAGEMENT  
WILDERNESS PLANNING AMENDMENT

RESPONSE TO LETTER 28-69

Response 1

The air quality in the Beaver Creek WSA is presently designated Class II under the Federal Clean Air Act. The designation of an area as wilderness does not change the air quality standards for that area. A recommendation for wilderness designation is not a recommendation for stringent air pollution controls. If this WSA is designated wilderness by Congress, nothing would necessitate a reclassification to Class I. The BLM Wilderness Study Policy states, "The Department of the Interior will not recommend reclassification to the more strict Class I in connection with future wilderness recommendations . . . air quality reclassification is the prerogative of the states. . . ." Such a decision would be made by the state of Colorado, not BLM. Therefore, the potential for redesignation is independent of the wilderness status of the area.

The City's position is that the Beaver Creek Area (D16), as recommended by the Bureau of Land Management for wilderness designation, is a beautiful natural area close to Colorado Springs providing recreational opportunities for non-motorized activities. We support such activities, but not wilderness designation for this particular area. The impacts that could occur to Colorado Springs have been identified by us through the public comment process and need not be restated. The main reason these impacts would occur is because of the unique legal status of wilderness areas. Wilderness designation would require, as per Colorado Air Pollution Control regulations, a reclassification hearing to determine if the air quality classification should be increased to Class I. The mere fact that the hearing would be held would require Colorado Springs' staff to expend considerable amounts of time and money in the hearing process. Additionally, should the air quality be classed as Class I, all future power plant additions at the Hanna Ranch would be required to have Best Available Control Technology (BACT), which means expensive wet scrubbers. There could also be an additional requirement to retrofit existing generating facilities with BACT. Therefore, Colorado Springs supports the land use designation of the Beaver Creek Study Area as non-motorized recreation and not wilderness.

The Environmental Impact Statement is inadequate on the following points:

1. Alternative B (no action) is not fully explored. No comparison is made with the potential air impacts of Alternative D (preferred alternative).



The potential protection of air quality afforded the Beaver Creek area with wilderness designation by virtue of the applicability of other Federal acts, and the impact on air quality with Alternative B is not adequately discussed.

2. Alternative B has not been fully explored. It was noted that in Beaver Creek the trails were limited to creek and gully bottoms due to the ruggedness of the area. Potential health impacts due to contaminated water resulting from increased human impact associated with wilderness is a real possibility and has not been addressed. Persons currently derive its drinking water supply from Beaver Creek, and a decrease in water quality from increased human impact, particularly Giardia lamblia, is a real possibility that has not been addressed and has significant economic impacts associated with it.

3. The United States Geological Survey study of mineral potential was not done prior to the BLM recommendation for wilderness. It is felt that the assessment of mineral potential of the area is inadequate since this study has not been made. In the absence of this study, the BLM statement on Beaver Creek that "wilderness designation would have little or no impact on mineral development" is premature. Additionally, the Colorado Energy Research Institute in September, 1978 has identified the southern portion of the Beaver Creek WSA as an "area of active exploration and development" for uranium. The Colorado Energy Research Institute notes their sources for this information are the Colorado Geological Survey, July, 1978; USGS, 1977 Energy Resource Map of Colorado and the U.S. Bureau of Mines Circular 8779, 1978. The Draft EIS references two reports in its determination of mineral potential for the Wilderness Planning Amendment. Those reports are "Geochemical

## Response 2

There are, and would continue to be, trails throughout the WSA, not just the creek bottoms. If the unit is designated wilderness by Congress, proper recreation management would be applied. The level of use on and off the trails, proper use dispersion, trail maintenance, etc., would be carried out to a level where health impacts would not likely occur. These factors would all be addressed in a wilderness management plan if the WSA is designated wilderness. It is not expected, because of the existing high quality of water and proper management practices within the WSA, that downstream water quality would ever be degraded.

As a result there would be little to no difference in the impact of recreation use on water quality between wilderness designation and nondesignation.

## Response 3

and Geophysical Evaluation of the Arkansas Canyon Planning Unit, Fremont and Carter Counties" and "Mineral Resources of the Arkansas Canyon Planning Unit" by Robert Coker. It should be noticed that these two reports do not include within their scope the Beaver Creek Study Area.

4. The Draft EIS notes that a major reason for removing Upper Grape Creek from wilderness recommendation is the occurrence of minerals in the general area of the Upper Grape Creek unit and not within the boundaries of that unit. The Draft EIS is not consistent as it omits patented tungsten claims on the westerly border of the Beaver Creek Wilderness Area as well as mineral potential information available in the USGS map "Reported Occurrences of Selected Minerals in Colorado", Mineral Investigations Resource Map M357, 1971. That map notes that gypsum and uranium occur within the Beaver Creek area. In townships adjacent to the Beaver Creek area, manganese, zinc, gem and ornamental stones, copper, feldspar, uranium, iron, gold, gypsum, silver, beryllium, mica, columbium, tantalum, tungsten, thorium, fluorapatite, tin, zirconium, hafnium, lead and rare earths occur. This is further evidence of the inadequacy of the mineral investigation.

5. There is an inadequate assessment of the social and economic effects as they relate to wilderness designation of Beaver Creek. Colorado Springs had submitted information indicating a substantial economic impact should the air quality be classified as Class 2. Additionally, there is an inadequate description of the methodology and assumptions used for calculating economic impact. The economic analysis is nothing more than a recitation of facts as they currently exist on the economic status of the various affected counties and communities. There is no discussion as to how the economic impacts of wilderness designation will affect the economic climate of the adjacent areas.

The determination of nominal mineral potential for the Beaver Creek WSA was based on an extensive literature search of mineral resources and developments within the proximity of the area in addition to an inventory of the area itself. The major findings of these investigations are contained in Chapter 3, Beaver Creek of the DEIS and this document. In areas identified as having some potential for mineralization, further investigation was initiated in order to more fully address this resource and findings identified only limited resource values and minimal potential for new discoveries. This further BLM investigation was done in response to an EILA request. The U.S. Geological Survey and the U.S. Bureau of Mines conducted a mineral survey of the Beaver Creek WSA during 1984. The results of these investigations were published in 1986 as USGS Bulletin 1716-B and U.S.B.M. Open File Report MIA 32-85. These reports confirm the earlier BLM determination that mineral resource potential for the Beaver Creek WSA is low. The previously identified areas of mineralization

were confirmed as being too small or uneconomical to develop under current and expected conditions. Based on this data, wilderness designation should not significantly impact mineral resources in this WSA.

#### Response 4

The first two statements are incorrect: 1. The DEIS does not state that a major reason for not recommending Upper Grape Creek for wilderness designation is the occurrence of minerals in the general area. In Chapter 3, page 40 of the DEIS, it states "There are no known significant mineral resources in and around this WSA." 2. There are no patented mining claims in the Beaver Creek WSA.

In reference to the mineral potential for the Beaver Creek WSA, the U.S. Geological Survey and the U.S. Bureau of Mines conducted a mineral survey of the Beaver Creek WSA during 1984. The results of these investigations were published in 1986 as USGS Bulletin 1716-B and U.S.B.M. Open File Report MLA 32-85. These reports confirm the earlier BLM determination that mineral resource potential for the Beaver Creek WSA is low. The previously identified areas of mineralization were confirmed as being too small or uneconomical to develop under current and expected conditions. Based on this data, wilderness designation should not significantly impact mineral resources in this WSA.

#### Response 5

Since air quality reclassification is the prerogative of the state of Colorado and not the BLM, potential for redesignation is independent of wilderness status. Therefore, any impacts, which may result should the air quality class be redesignated, are not to be analyzed in this EIS.

The economic gain to the local and regional economy as a result of wilderness designation or nondesignation of all WSAs would change by less than 1 percent. Therefore, the impacts on economic conditions were dropped from further analysis. Further discussion on impacts on economic conditions is in Chapter 1 of this FEIS.

Page 4

6. The Draft EIS is inadequate in its analysis of the criteria for maximization of public benefits related to wilderness designation of Beaver Creek. The potential adverse effects on the growth potential and economic base of Colorado Springs as well as the increase cost to electric consumers through wilderness designation and subsequent air quality reclassification is not adequately addressed. It is felt that the maximization of public benefits would be to provide non-motorized recreational activities near the Front Range population centers, at the same time not setting the stage for potential adverse impacts.

7. There is an inadequate discussion of air quality impacts. The State of Colorado is required by regulation to hold a reclassification hearing. There is no mention of the Air Pollution Control Commission's regulations in the Draft EIS. Merely noting the existence of the Clean Air Act and its separation from the BLM wilderness designation process does not adequately address the possible adverse effect. The Cumulative Impact Analysis Table notes that air quality impact would be "negligible for all areas" should wilderness designation occur. This is inadequate in light of the information that has been provided to the Bureau of Land Management throughout the wilderness study process. Furthermore, the Colorado Air Pollution Control Commission has not identified any areas in El Paso or Teller as being high quality. The EIS notes that the northern portion of Beaver Creek has been identified as an area of high quality, however does not reference any reports or correspondence from the Commission. Therefore, the document is inadequate due to the lack of documentation of this statement.

Response 6

Since air quality reclassification is the prerogative of the state of Colorado and not the BLM, potential for redesignation is independent of wilderness status. Therefore, any impacts, which may result should the air quality class be redesignated, are not to be analyzed in this EIS.

Response 7

The purpose of this FEIS is to analyze the impacts of designating or not designating the seven WSAs in the Canon City District as wilderness. Since the potential for air quality reclassification is independent of wilderness status, it is not within the scope of what this FEIS is intended to analyze. All actions on projects proposed or anticipated in any of the WSAs would be within the constraints of the existing Class II air quality standards. Therefore, impacts on air quality are not an issue for any of the WSAs.

28-69

Page 5

8. The discussion of recreation as it impacts the Beaver Creek WSA is inadequate. It is noted in the Draft EIS that dispersed primitive recreation is available. It is also noted that access is limited to creek bottoms.

Therefore, an analysis of the area indicates that all human traffic would be routed into these narrow corridors and would not provide dispersed primitive recreation. Due to the limited trail system, a real danger of flash flooding exists to the recreational user which is not addressed in the Draft EIS.

Finally, the methodology and assumptions in calculating visitor days to the wilderness area should the area be designated is inadequate. The Draft EIS notes that there is a need for a wilderness in El Paso County and references a State recreation plan. It should be noted that a need for wilderness in a certain area is not justification for creating a wilderness area.

9. The Draft EIS notes that there are "no outside sites or sounds which would have an effect within the Wilderness Study Area." The statement is an inadequate analysis of the environment external and adjacent to the Beaver Creek WSA. As noted in prior correspondence, a major east-west flight path is directly above the area. Aircraft can be heard any time of the day and night. The industrial activity in the Arkansas Valley can be seen from many high points within the Wilderness Study Area, and the lights of Colorado Springs and Pueblo can be seen reflected in the night sky from any point within the area. Sounds from activities at Fort Carson are also present.

10. The Draft EIS notes that hydrologic conditions are near optimum and that impact to water would occur as a result of actions permitted if this area were not wilderness. This statement is not true as the Beaver Creek

Based on state and Federal ambient air quality data, 11 areas in the NGRA were identified by the BLM resource staff as "areas of high air quality." Some of the basic resource factors considered were: "... 1. remoteness, 2. high altitude, 3. inaccessibility, ...".

The northern portion of the Beaver Creek WSA was one of the above mentioned "areas of high air quality." Inadvertently it was shown in the DEIS that the State Air Pollution Control division has identified these areas instead of the BLM resource staff. This has been omitted from the FEIS.

#### Response 8

Any danger to recreation users from flash flooding would occur regardless of wilderness designation. Therefore, it is not addressed in this WSA. In addition if any of the WSA should be designated wilderness, a detailed wilderness management plan would be developed as part of the activity planning phase. Factors such as dispersing primitive recreation use and possible safety hazards would be addressed in this plan.

#### Response 9

The reference in the DEIS to this subject states that the State of Colorado 1981 Outdoor Recreation Plan "... indicates that wilderness uses in the state, region 4 (Park, Teller, and El Paso Counties, and region 13 (Lake, Chaffee, Fremont, and Custer Counties are highly needed." It does not say nor infer that formally designated wilderness areas are necessary to meet this need.

#### Response 10

In the Beaver Creek WSA, activities such as construction of primitive roads and other surface disturbing activities that would occur, if the WSA is not designated wilderness, would be outside the Beaver Creek watershed. If the WSA is designated wilderness, no surface disturbing activities are expected to occur. Therefore, neither wilderness designation nor nondesignation would impact water quality within the WSA.

There are, and would continue to be, trails throughout the WSA, not just the creek bottoms. If the unit is designated wilderness by Congress, proper recreation management would be applied. The level of use on and off the trails, proper use dispersion, trail maintenance, etc., would be carried out to a level where health impacts would not likely occur. These factors would all be addressed in a wilderness management plan if the WSA is designated wilderness. It is not expected, because of the existing high quality of water and proper management practices within the WSA, that downstream water quality would ever be degraded.

Wilderness Study Area is a partial watershed. The BLM has no control over water quality or quantity. Water quantity impacts could occur regardless of designation because of the diversions by Colorado Springs, Victor and Cripple Creek above the Beaver Creek area for municipal use. Additionally, the impact to water quality from increased recreational use as referenced before was not discussed.

11. The Draft EIS notes that physical and legal access is limited to the Beaver Creek WSA. This seems to be an understatement and not fully explained. Access to the Beaver Creek area is limited to two points: access to the upper portion of West Beaver Creek from Skagway Reservoir and access to the main stem of Beaver Creek from the State lands to the south. This further illustrates the confinement of recreational traffic to a few limited corridors.

12. It was noted in the Draft EIS that designation of Wilderness would be consistent with local plans with the potential exception of the plans for the Hanna Ranch as a comprehensive utility facility for Colorado Springs. The Draft EIS has inadequately assessed the consistency with local plans should the area not be designated wilderness. It is felt that the no-action alternative would be consistent with local plans just as the wilderness designation would be.

13. The Draft EIS analysis of wilderness quality for the Beaver Creek WSA is inadequate and to support this contention, we reference the documentation on wilderness attributes submitted by the City prior to the issuance of the Draft EIS. Additionally, it should be noted that the Draft EIS makes the admission that no WSA considered in the document would contribute a unique eco-system or land form to the wilderness preservation system.

As a result there would be little to no difference in the impact of recreation use on water quality between wilderness designation and nondesignation. We agree that water quantity impacts could occur regardless of designation.

#### Response 11

Thank you for your comment. We deleted this from the FEIS.

#### Response 12

It is unclear what is meant by "inadequate" when referring to the analysis of wilderness quality. The letter from Colorado Springs referenced here primarily states that the WSA is not in a natural condition. A response was appropriately prepared by the BLM Colorado State Director (dated January 22, 1981) during the inventory stage of the wilderness process. The letter, from the State Director, accurately documented the naturalness of the WSA. The area was consequently designated as a wilderness study area.

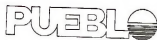
Ecosystems and landforms are only two of the many considerations in determining the value of an area for wilderness with neither being a requirement for wilderness designation.

#### Response 13

To clarify any possible confusion concerning the memorandum of understanding with the State Division of Wildlife, the following sentences have been added to the beginning of Chapter 3 for the Beaver Creek WSA, in this FEIS: "A memorandum of understanding between BLM and DOW is intended to ensure compliance with the guidelines set forth in the BLM Interim Management Policy and Guidelines for Lands Under Wilderness Review dated December 12, 1979. If the WSA is designated wilderness, this memorandum would continue to be in effect; if the WSA is not designated wilderness, the memorandum would be terminated."

14. The Draft Environmental Impact Statement is inadequate as to the discussion of the agreement between the Bureau of Land Management and the State Division of Wildlife to manage the Beaver Creek WSA "consistent with wilderness management objectives." To the casual reader, the agreement executed prior to the recommendation for wilderness is prejudicial to the outcome of the Wilderness Study Area process and demonstrates a bias judgment on the part of the Bureau of Land Management.





City of Pueblo

December 13, 1982

29-87

Mr. Jack Albright, Project Manager  
Bureau of Land Management  
P.O. Box 1470  
Canon City, CO 81212

RESPONSE TO LETTER 29-87

Thank you for your letter.

Dear Mr. Albright:

Please be advised that the City Council of the City of Pueblo recommends that the BLM adopt a "non-motorized" classification for recreation at the Beaver Creek Wilderness Area.

We feel this is a more natural classification and would contribute to the value of the Beaver Creek Area in the long run.

Yours truly,

*Fred E. Weisbrod*  
Fred E. Weisbrod  
City Manager

FEW:rm

RESPONSE TO LETTER 30-71

Response 1

The air quality in the Beaver Creek WSA is presently designated Class II under the Federal Clean Air Act. The designation of an area as wilderness does not change the air quality standards for that area. A recommendation for wilderness designation is not recommendation for stringent air pollution controls.

If this WSA is designated wilderness by Congress, nothing would necessitate a reclassification to Class I. The BLM Wilderness Study Policy states, "The Department of the Interior will not recommend reclassification to the more strict Class I in connection with future wilderness recommendations . . . air quality reclassification is the prerogative of the states. . . ." Such a decision would be made by the state of Colorado, not BLM. Therefore, the potential for redesignation is independent of the wilderness status of the area.

If the Beaver Creek WSA is not designated wilderness, it would be managed as described in this FEIS.

P.O. Box 1427 Pueblo, Colorado 81002 (303) 545-0561



EL PASO COUNTY

**OFFICE OF THE BOARD**

OF

COUNTY COMMISSIONERS

27 EAST VERMILIO  
COLORADO SPRINGS, COLORADO 80909

December 3, 1982

30-71

Mr. Jack Albright  
Project Manager  
Bureau of Land Management  
Royal Gorge Resource Area  
P.O. Box 1470  
Canon City, CO 81212

Dear Mr. Albright:

Reference the Draft EIS/Wilderness

We El Paso County Commissioners take a position identical to the City of Colorado Springs regarding the wilderness designation recommendation on the Beaver Creek Wilderness Study Area.

We are concerned that a wilderness designation and the required air quality reclassification hearing triggered by this designation could result in increased air quality standards that will be to the economic detriment of the County as a whole. Our position is that BLM has at its disposal administrative controls that are sufficient to protect this area for non-motorized recreation and that those controls should be exercised instead of making wilderness designation. Our feeling is that this course of action would minimize potential adverse social and economic effects.

We appreciate the opportunity to comment.

Sincerely,

*Tom Collier, Jr.*  
Tom Collier, Jr.  
Chairman

5-29

REQUEST FOR LOCAL COMMENTS FOR CLEARINGHOUSE REVIEW

Date: 10/13/82 PPACG Identifier: # 82-088  
To: El Paso County Land Use  
John Fisher  
27 E. Vermijo  
Colorado Springs, CO 80903  
From: David Salamon, Regional Planner  
Project Title: Draft EIS on Canon City District Wilderness Planning Amendment

Applicant: Bureau of Land, Department of Interior

REVIEW DATE: 11/10/82

To help in the Clearinghouse review process, the PPACG is requesting your agency or organization comment on this proposed project. A description of the project is attached. Please answer the following questions, if applicable. Make any additional comments in the space provided.

- ☐ Yes ☐ No This project is consistent with the goals, objectives, plans and programs of this agency or jurisdiction.  
☐ Yes ☐ No There is a need for this project.  
☐ Yes ☐ No This project is the most effective and efficient way to meet the need.  
☐ Yes ☐ No There is evidence that this project duplicates an existing program.  
☒ No comments at this time 10/15/82

Additional comments

(Continue comments on back of this form, if necessary)

PLEASE KEEP THE PINK COPY FOR  
YOUR RECORDS AND RETURN THE  
WHITE AND YELLOW COPIES TO PPACG NO LATER THAN

11/8/82

PIKES PEAK AREA COUNCIL OF GOVERNMENTS

27 E. Vermijo, Colorado Springs, Colorado 80903 (303) 471-7080

PPACG

A-95 CLEARINGHOUSE REVIEW

Date: November 13, 1982 PPACG Identifier: 82-088  
TO: Bureau of Land Management  
ADDRESS: GRM, P.O. Box 1470, Canon City, CO 81212  
FROM: David Salamon  
PROJECT TITLE: Draft EIS on Wilderness Planning Amendment for Canon City District

The Pikes Peak Area Council of Governments at its meeting on 11/10/82, voted to forward the following comment(s) on this proposed project:

- ☐ Favorable - the project does not appear to conflict with Regional Plans, programs, or objectives.  
☐ Unfavorable, for the following reasons:

- ☐ No Comment  
☐ No Action, postponed until the next \_\_\_\_\_ on \_\_\_\_\_

- ☒ The following comments were made by the PPACG Board:  
Favorable comment of the Beaver Creek WSA proposal for wilderness designation, with heavy emphasis being placed on the condition that a Class II Air Quality Standard remain for the wilderness area. No comment was given for the other six wilderness study areas.

Copies of the following are attached: ☒ Local Comments

☒ PPACG Staff Comment

☐ Copy sent to State Clearinghouse on \_\_\_\_\_

Please forward a copy of this form and local comments with your application to the funding agency.



## CITY OF COLORADO SPRINGS

The "America's Beautiful" City

OFFICE OF THE MAYOR

P.O. BOX 1575

COLORADO 80901

November 1, 1982

31-33

RESPONSE TO LETTER 31-33

ROBERT M. ISAAC  
MAYOR

TEL (303) 576-8800

Jack Albright, Project Manager  
Bureau of Land Management  
Royal Gorge Resource Area  
P. O. Box 1470  
Canon City, CO 81212

Dear Mr. Albright:

This letter is in response to your request for comments relative to the Draft BLM Environmental Impact Statement on proposed wilderness areas. In addition to this letter, technical comments concerning the adequacy of the EIS are forthcoming.

Should Congress adopt the BLM proposal for designating Beaver Creek as a wilderness area, new emission sources in the Colorado Springs area could then be subject to an additional section of the Clean Air Act. These federal requirements are intended to establish pristine air quality within wilderness areas and, as interpreted by a few, to create unintergrated wastes extending beyond the wilderness boundaries. Colorado Springs is not yet convinced that such controls bear the public interest when applied to areas such as Beaver Creek. The cost to our electric ratepayer would be significant.

It is unfortunate that the potential application of federal visibility authority forces the City into a position of concern for a wilderness designation that would otherwise be supportable. Upcoming amendments to the federal Clean Air Act will more than likely include changes to the visibility program. As proposed, some changes would intensify our concerns while other proposals would probably eliminate our concern for the Beaver Creek designation. For this reason Colorado Springs hereby suspends judgment on the potential impact of the proposed wilderness designation until the intent of Congress concerning visibility is clarified. We expect this clarification prior to Congressional consideration of the BLM Wilderness proposals.

I hope you find these comments helpful. If you have questions please contact me.

Sincerely,

Robert M. Isaac  
Mayor

apc  
cc: City Council  
Congressional Delegation  
PPACG

Response 1

The air quality in the Beaver Creek WSA is presently designated Class II under the Federal Clean Air Act. The designation of an area as wilderness does not change the air quality standards for that area. A recommendation for wilderness designation is not a recommendation for stringent air pollution controls.

If this WSA is designated wilderness by Congress, nothing would necessitate a reclassification to Class I. The BLM Wilderness Study Policy states, "The Department of the Interior will not recommend reclassification to the more strict Class I in connection with future wilderness recommendations . . . air quality reclassification is the prerogative of the states. . . ." Such a decision would be made by the state of Colorado, not BLM. Therefore, the potential for redesignation is independent of the areas wilderness status.

RESPONSE TO LETTER 32-32

32-32

## PIKES PEAK AREA COUNCIL OF GOVERNMENTS

27 East Vermo, Colorado Springs, Colorado 80902 (303) 471-7080

November 15, 1982

PPACG

Mr. Jack Albright, Project Manager  
Bureau of Land Management  
Royal Gorge Resource Area  
P. O. Box 1470  
Canon City, CO 81212

Dear Mr. Albright:

This letter is in response to your request for comments relative to the BLM Draft Environmental Impact Statement regarding the Canon City Wilderness Planning Amendment.

The Pikes Peak Area Council of Governments formally reviewed the BLM wilderness proposal at its November 10, 1982 regular meeting. Of particular interest and discussion was the Beaver Creek Wilderness study area. As you are aware, the WSA is located approximately 7 miles to the west of Colorado Springs electric power plant. Due to this proximity there is the concern that the designation of wilderness area would evoke a higher class air quality standard for the area having significant cost implications for the City of Colorado Springs.

It is a preference that the Beaver Creek WSA be preserved as a wilderness area. It is just unfortunate that the potential for application of the Federal Clean Air Act could result in such a financial impact upon the municipality and electric consumer alike.

Nevertheless, the PPACG voted 4-3 on the motion that favorable comment be given to the Beaver Creek WSA proposed for wilderness designation. It was the Council's concern that heavy emphasis be placed on the condition that a Class II Air Quality Standard remain for the Beaver Creek area. No comment was given for the other six WSA proposals because of the significance and concern for the condition placed on the Beaver Creek WSA.

If there are any questions please feel free to call.

Thank you,

David A. Salamon  
Regional PlannerResponse 1

The air quality in the Beaver Creek WSA is presently designated Class II under the Federal Clean Air Act. The designation of an area as wilderness does not change the air quality standards for that area. A recommendation for wilderness designation is not a recommendation for stringent air pollution controls.

If this WSA is designated wilderness by Congress, nothing would necessitate a reclassification to Class I. The BLM Wilderness Study Policy states, "The Department of the Interior will not recommend reclassification to the more strict Class I in connection with future wilderness recommendations . . . air quality reclassification is the prerogative of the states. . . ." Such a decision would be made by the state of Colorado, not BLM. Therefore, the potential for redesignation is independent of wilderness status of the area.

5-31

JON H. GIGUERE  
COMMISSIONER DIST. NO. 1  
R. H. HAYDEN, JR.  
COMMISSIONER DIST. NO. 2  
GEOFFREY D. AMARA  
COMMISSIONER DIST. NO. 3



JON H. GIGUERE  
CHAIRMAN OF BOARD  
LUCILLE WILSON  
CLERK OF BOARD  
JAMES W. PHILLIPS  
COUNTY ATTORNEY

BOARD OF COUNTY COMMISSIONERS  
PUEBLO COUNTY, COLORADO

December 27, 1982

RESPONSE TO LETTER 33-91

Thank you for your letter.

Mr. Jack Albright, Project Manager  
Bureau of Land Management  
P.O. Box 1470  
Canon City, Colorado 81212

Dear Mr. Albright:

I am writing you, on behalf of the Board of County Commissioners, to express our feelings that the interests of the public and the preservation of the Beaver Creek area can best be achieved through adoption of a "non-motorized" classification under the regulatory control of the Bureau.

Sincerely,

Jon H. Giguere, Chairman  
Board of County Commissioners

JHG/tw

COUNTY-CLERK, PUEBLO, COLORADO 81003

(303) 543-3550

RESPONSE TO LETTER 34-73

Response 1

34-73

TELLER



COUNTY

Cripple Creek, Colorado 80813

December 6, 1982

Mr. Jack Albright  
Project Manager  
Bureau of Land Management  
Royal Gorge Resource Area  
P.O. Box 1470  
Canon City, CO 81212

RE: Draft R15/Wilderness

Dear Mr. Albright:

We are writing this letter to take the same position as the City of Colorado Springs as it relates to recommendation for wilderness designation of the Beaver Creek Wilderness Study Area.

Teller County is concerned that wilderness designation and the required air quality reclassification hearing triggered by this designation could result in upgrading air quality standards to the economic detriment of Teller County as a whole. It is our position that BLM has at its disposal administrative controls sufficient to protect this area for non-motorized recreation and that those controls should be exercised instead of wilderness designation. It is the County's feeling that this course of action would minimize potential adverse social and economic affects.

We appreciate the opportunity to comment on this process.

Very truly yours,

*Charles L. H. Mattson*  
Charles L. H. Mattson  
Chairman  
The Board of County Commissioners  
Teller County, Colorado

5-32

The air quality in the Beaver Creek WSA is presently designated Class II under the Federal Clean Air Act. The designation of an area as wilderness does not change the air quality standards for that area. A recommendation for wilderness designation is not a recommendation for stringent air pollution controls.

If this WSA is designated wilderness by Congress, nothing would necessitate a reclassification to Class I. The BLM Wilderness Study Policy states, "The Department of the Interior will not recommend reclassification to the more strict Class I in connection with future wilderness recommendations . . . air quality reclassification is the prerogative of the states. . . ." Such a decision would be made by the state of Colorado, not BLM. Therefore, the potential for redesignation is independent of wilderness status.

If the Beaver Creek WSA is not designated wilderness, it would be managed as described in this FEIS.

Bureau of Land Management  
Box 1470  
Canon City, Colorado 81212

RESPONSE TO LETTER 35-4

October 9, 1982

Thank you for your letter.

To the Bureau of Land Management:

I would like to express my disappointment that the Canon City office of the BLM, in its Draft Environmental Impact Statement concerning lands currently being studied for wilderness designation, has not had the courage to include McIntire Hills, San Luis Hills, Upper and Lower Grape Creek and the Beaver Creek area. I urge the BLM to include those areas in its recommendations.

Sincerely,

*Brice Berger*  
Brice Berger  
Box 442  
Aspen, Colorado 81612

cc. Rep. Ray Kogovsek

TESTIMONY OF JOHN STANSFIELD, CONSERVATION CHAIRMAN OF THE PIKES PEAK GROUP OF SIERRA CLUB, AT WILDERNESS HEARINGS ON CANON CITY DISTRICT, BUREAU OF LAND MANAGEMENT WILDERNESS STUDY AREAS, OCTOBER 1982

36-5

I am John Stansfield, Conservation Chairman for the more than 450 members of the Pikes Peak Group of Sierra Club living in southeast Colorado. Our organization has a long-standing interest in the wild lands of the Canon City District of BLM, dating back more than ten years to the time of our Group's first hike into Beaver Creek. Since that time members of our Group have hike, enjoyed, and studied all of the Wilderness Study Areas (WSA's) (save Sand Castle, I believe) in question at these hearings. We have also actively participated in Lane Use Planning processes and decision-making on the District over the past decade and have hiked and enjoyed many of the non-selected initial inventory and intensive inventory areas here since the inception of the BLM Wilderness Process four years ago. (I personally have been privileged to be a member of the Canon City District Citizens Advisory Board for two years during the Wilderness evaluation.) District staff members have several times presented informational updates of the Wilderness process to our members at our Group's general meetings.

And so, we feel well qualified and informed to comment on the Wilderness Study Areas in the Canon City District and to make our own recommendations regarding their future determination. First, we wish to thank the staff of the District for their generally excellent job of public involvement and information distribution throughout the inventory and study processes. Their efforts are much appreciated by our Group. Their fine field research is one of the bases for our conclusions about the WSA's.



At these hearings we intend to present a capsule view of our proposal, the Sierra Club's Preferred Alternative for the WSA's. In addition, we intend to make a few comments on the Draft Environmental Impact Statement (EIS) as prepared by BLM and the analysis it contains. We intend to present more complete supplementary comments in writing for the Hearing Record at a later date.

Although this EIS (or any other!) will never be on the best seller list, it is generally clearly written and well-illustrated. This is very helpful to us and appreciated. The Pike/San Isabel National Forest could take some lessons from the BLM in this area. However, several important aspects in the Unit by Unit Description of Environment are missing or inadequate:

(1) Missing in the Recreation section is the important statement that the WSA's are generally accessible year-round to foot and horse-back travel, a rare attribute in Colorado wilderness:

(2) Inadequate in the Recreation section are recreation day figures which seem questionably accurate. For example, 280 recreation days per year for Beaver Creek is far below what, from our experience, is actual use. It may be two or three times that stated by BLM. Of course, more accurate recreation use figures will also strongly affect economic values attributed to WSA's.

(3) Inadequate in the Wilderness section is the relevancy of vegetative-type comparisons based on the Baily-Kuchler ecosystem. The classifications tend to be so broad as to ignore important vegetative

## RESPONSE TO LETTER 36-5

Response 1

Although there are many varied land classification systems available, BLM has selected the Baily-Kuchler Ecosystems of the United States system (Baily, 1976 and Kuchler, 1966). This system was selected because it is a land classification system that facilitates planning at the national level. In addition, it provides a broad synthesis of current knowledge about the ecosystem geography of the country. It also serves as a useful reference for those who desire an overview on a comparative basis for ecosystem and landform representation in existing and potential National Wilderness Preservation System (NWPS) units.

36-5

aspects of the areas. For example, Upper and Lower Grape Creek may fall in the class as stated, but this does not indicate that its vegetative composition, and thus its visual aspects, is unlike any other area in Colorado. The area is unique among Colorado wilderness and WSA's.

It is in the BLM's Recommended Alternative that individual resources are compared and recommendations made. In the analysis of Lower and Upper Grape Creek and San Luis Hills, we feel that BLM has tended to de-emphasize the wilderness values existing in these areas in comparison to developable resources, such as minerals, and projects. Our wilderness sum total for these areas comes out higher than BLM's for numerous reasons. We feel that the Grape Creeks and San Luis Hills qualify for wilderness recommendation. The information provided in the Draft EIS justifies our viewpoint.

Our proposal for each area is as follows:



Donald E. Potter, M.D.

1426 Lombard Avenue  
Canon City, Colorado 81212

12 October 1982

37-6

To Whom It May Concern:

I appreciate the opportunity to comment as an individual on the Canon City BLM District Wilderness Draft Environmental Statement. I have had opportunities to experience several of these areas personally, since I live in Canon City.

For the Beaver Creek WSA, I would wholeheartedly support wilderness designation in the form of Alternative C. This proposal would include 20,750 acres out of the original 26,150, omitting three hard-to-manage spurs and a small area of heavy OVM use. The scenic, recreational, geologic and wildlife values of this outstanding area, combined with low possibilities for other resource uses and its proximity to Colorado Springs, make it an ideal addition to the Wilderness system.

Brown's Canyon likewise deserves full protection of the 6,614 acre unit, especially in light of the opportunities here for solitude and primitive/unconfined recreation.

The small Sand Castle area would make a nice addition to the adjacent Great Sand Dunes National Monument.

As for Upper and Lower Grape Creek, I would favor Wilderness recommendation. The area has close proximity to Canon City, has little mineral potential as noted by the Coker Mineral Study, and has little accessible timber. The old railroad grade does not detract from the wilderness qualities, but adds historical interest. Grazing could certainly continue. In my several hikes into the area, in summer, winter, and spring, I have been able to experience solitude and primitive recreation, seeing no other persons. Several Boy Scout groups from Canon City routinely use this area for primitive recreation. I feel that any other conflicting resources recommended for this area could be re-directed elsewhere; for example, to the nearby McIntyre Hills WSA which is less suitable for wilderness designation.

In summary, I would support wilderness designation for:  
1) Beaver Creek (Alternative C), 2) Brown's Canyon, 3) Sand Castle,  
4) Upper and Lower Grape Creek, and 5) San Luis Hills.

Respectfully yours,

*DE Potter*

DEP:mp

RESPONSE TO LETTER 37-6

Thank you for your letter.

38-8

Oct. 12, 1982

Jeffrey Koidel  
416 7th St.  
Burlington, CO 80307

Mr. Jack Albright, Project Manager  
Bureau of Land Management  
Royal Gorge Resource Area  
P.O. Box 1470  
Canon City, CO 81212

Dear Mr. Albright,

I am writing in regards to upcoming BLM wilderness designation recommendations.

Colorado faces unprecedented population growth in the next few years. By 2000 front range growth will nearly double and the last remnants of open land along the foothills will be lost.

Yet, we now have the opportunity (and foresight) to hang on to a few of the last vestiges of open land--Colorado's wilderness. This is the wilderness that is Colorado's calling card, and the future playground of the urban population centers of the 21st century. These areas in your resource area will help to absorb recreational losses along the foothills. Perhaps wilderness designation offers no direct financial reward, however, it stimulates our tourist industry and even draws money from those visitors who never directly use the area. Remember, Colorado is a rugged mountain wilderness in the eyes of our tourists. Yet if we destroy our wilderness areas, we also destroy that image.

I support Alternative C in regards to the Beaver Creek proposal, the Sand Castle BLM recommendation, and the San Luis Hills area (Alternative C). I concur with the BLM non-wilderness designation of the McIntyre Hills area, but oppose BLM's non-wilderness recommendation of the Lower and Lower Grape Creek area.

Please include this letter as a part of the hearing record.

Sincerely,

*Jeffrey Koidel*  
Jeffrey Koidel

P.S. I would appreciate a complete copy of the DEIS for the above mentioned areas. Thank-you.

5-35

RESPONSE TO LETTER 38-8

Thank you for your letter.

Jack Albricht, Project Manager  
Bureau of Land Management  
Royal Gorge Resource Area  
P.O. Box 1470  
Canon City, Co. 81212

October 15, 1982

Sir:

This letter contains comments regarding the BLM evaluation of lands for wilderness inclusion/exclusion in the Royal Gorge Resource Area.

I wish this letter to be made part of the hearing records for the hearings which took place Oct. 12-14, 1982.

The undeveloped land remaining in the United States is fast diminishing. As our population increases there is more need for the therapeutic and recuperative experiences that are provided by open spaces in a wilderness state. Many psychologists have recognized the benefits of wilderness experiences on our urbanized lives.

Natural resources are of great concern today. There has been an emphasis on the mineral, timber and grazing resources to the exclusion of genetic resources. Genetic diversity is a resource that will provide great benefits to our technological future if those resources are still to be found when research is ready for them. Our genetic resources are provided by wilderness lands; although it is only part of what wilderness lands provide.

Please consider the following comments on these specific units of BLM land considered for inclusion or exclusion as wilderness. Also, please keep in mind that these BLM lands represent the last wild desert and canyon lands in Colorado, undominated by existing alpine wilderness.

BEAVER CREEK: I support Alternative C which includes all of the original acreage except for 3 hard-to-manage spurs and a heavily-used area. I oppose preferred Alt. D which eliminates 4000 acres south of Holbert drainage on the grounds that this section is an integral part of the larger Beaver Creek ecosystem whose timber values are far outweighed by backcountry, wildlife genetic diversity, and other wilderness values.

BROWN'S CANYON: I wholeheartedly support the BLM wilderness recommendation for the full 6614 acres of this unit, especially since it will allow future consideration of Brown's Canyon and the contiguous wild Aspen Ridge Forest Service area as a jointly managed wilderness area. I wish to point out that the terrain here is too rugged to make timber and minerals production economical.

SAND CASTLE: I affirm BLM's wilderness recommendation for this very small 1644 acre area, which will round out the adjacent Great Sand Dunes National Monument.

39-9

UPPER and LOWER GRAPE CREEK: I strongly oppose BLM's non-wilderness recommendation on the basis that the DEIS emphasizes timber, grazing, minerals, and ORV potential to the detriment of natural attributes such as raptor habitat and species diversity. Minerals potential is cited as a basis for exclusion, despite the Coker minerals study which concludes the area has 'little economic potential'. The DEIS is framed in negative terms. For example, it says that wilderness designation will lead to 'losses in potential increases' of livestock, timber and motorized recreation. Wilderness benefits are virtually ignored. I strongly recommend inclusion of both areas: Upper and Lower Grape Creek, with the exception the the Sunset Gulch section of Lower Grape Creek, and a small SE section of Upper Grape Creek containing inholdings.

SAN LUIS HILLS: Despite recent interest in the copper and molybdenum potential of this unit, these values are FAR outweighed by the fact that San Luis Hills is one of only 2 Colorado units representing the 'fescue mountain scrub prairie vegetation class' and therefore provides a rare addition to the National Wilderness Preservation System. Similar minerals are found nearby, whereas the unique geologic and plant values of this unit are irreplaceable. I STRONGLY RECOMMEND INCLUSION OF SAN LUIS HILLS unit minus the heavily mineralized NE section deleted in Alternatives C and D.

MCINTYRE HILLS: Intensive management of this area for rangeland, timber and ORV use has been long planned. Because these values in this area are higher than its wilderness values compared with the other units, I concur with the BLM's non-wilderness recommendation for this area.

Thank you for your attention.

Heather J. Hubbard  
c/o Southernland PI  
Manitou Springs, Co. 80829

RESPONSE TO LETTER 39-9

Thank you for your letter.



Paul Evans  
Box 228  
Buena Vista  
Colorado  
81211

Oct. 18, 1982

Jack Albright  
BLM  
Canon City, Co.

to be included in  
hearing record - re: Brown's Canyon.

Dear Mr. Albright,

This is very close to home! I teach school in Buena Vista and spend many valuable hours in the Brown's Canyon area. I am an artist. The river and the surrounding wilderness have given me inspiration (and resulting art sales) for years. For the deeper, aesthetic meaning of life, for the higher good, I support BLM wilderness recommendation for the full 6,614 acres of this unit.

Please.

Paul Evans

RESPONSE TO LETTER 40-10

Thank you for your letter.

41-12

Stewart M. Green Photography  
825 E. Cliche La Poudre  
Colorado Springs, Colorado 80903  
(303) 471-3637

October 20, 1982

Jack Albright, Project Manager  
Bureau of Land Management  
Royal Gorge Resource Area  
P.O. Box 1470  
Canon City, CO 81212

Dear Mr. Albright:

I am writing regarding the recommendations concerning the BLM Wilderness Study Areas in the Royal Gorge Resource Area. I urge the BLM to support Alternative C for the Beaver Creek area; it is important to include those extra 4000 acres to ensure protection of the corresponding eco-system in the east of the area as well as for the scenic values along the south slope of the Pikes Peak Massif. I fully support the BLM's recommendation for full inclusion of the Brown's Canyon study area. I urge the BLM to support Upper and Lower Grape Creek for future wilderness. After studying the EIS the mineral potential just does not seem sufficient basis for exclusion, as the EIS says "The known deposits and the potential for discovery of new resources in and around this WSA are not significant." The same is said regarding Upper and Lower Grape Creek. Having visited the area there does not seem to be significant forest reserves that couldn't be harvested on other BLM lands nor would the range loss be significant. I urge the BLM to support Alternative C with some modifications for Upper and Lower Grape Creek WSA's. The San Luis Hills could also be included by adopting Alternative C. The boundary changes would eliminate the main resource conflict with minerals and still provide a wilderness area in southern Colorado of uniqueness. Particularly since the San Luis Hills are a unique and distinctive eco-system; to quote the EIS: "The presence of this vegetative category in the Natl. Wilderness System would contribute to expanding the diversity of the natural systems and features in the state." The same minerals occur nearby. I have hiked and camped throughout this unit and find it's solitude and scenery magnificent; please recommend it for wilderness designation. I would like this letter to be included as part of the hearing record.

Sincerely,

Stewart M. Green

5-37

RESPONSE TO LETTER 41-12

Thank you for your letter.

## PRYOR, CARNEY AND JOHNSON

A PROFESSIONAL CORPORATION

ATTORNEYS AND COUNSELORS AT LAW

7503 MARIN DRIVE, SUITE 20

GREENWOOD PLAZA

ENGLEWOOD, COLORADO 80111-2288

303 771-8200

## MAILING ADDRESS:

POST OFFICE BOX 82003

WELLSFIRE STATION

DENVER, COLORADO 80222-0003

PETER W. PRYOR  
ROBERT W. CARNEY  
IRVING G. JOHNSON  
W. RANDOLPH BARNHART  
THOMAS L. ROBERTS  
HUGH O. BIRNBAUM  
RODNEY H. PATULLA  
SHELDON H. SMITH  
DAVID C. LARSEN  
RONALD L. ANTONIO  
CHRISTOPHER N. HANMEL  
EDWARD O. BRONFEN  
HOWARD W. HANMEL  
HARRIS K. SLEAZA  
ELIANE A. HERTER

RESPONSE TO LETTER 42-13

Thank you for your letter.

MARA A. VOGLER  
OF COUNSEL

October 19, 1982

Jack Albright, Project Manager  
Bureau of Land Management  
Royal Gorge Resource Area  
P.O. Box 1470  
Canon City, CO 81212

RE: BLM Wilderness

Dear Mr. Albright:

At the outset, I want to applaud the BLM for its designation of Beaver Creek and Brown's Canyon as wilderness areas. These will make marvelous additions to our wilderness preservation system in the United States.

I am convinced the BLM has, however, omitted several outstanding areas in its recommendations for wilderness designation. I am particularly concerned about the fate of upper and lower Grape Creek Canyon. These areas offer exceptional possibilities for solitude in a wild and primitive state. This seems to me to more than outweigh any economic potential, especially considering the vast other holdings of the BLM which can be exploited on those terms. After all, the areas available for wilderness are miniscule in comparison to those which will be available for some kind of development.

In addition, the exclusion of the San Luis hills area is extremely disappointing. It is one of the few remaining areas in southern Colorado left for possible inclusion in the national wilderness preservation system. Its unique vegetation alone is sufficient to warrant protection from development. Any minerals potential in this unit is balanced by available sources nearby. As I understand it, available reports indicate that the northeast section of this unit is already heavily exploited and therefore should probably be deleted as an alternative.

42-13

Page 2  
Jack Albright  
October 19, 1982

I request this letter be made part of the hearing record and I look forward to reviewing the final environmental impact statement on these areas.

Very truly yours,

  
Nick Ervin

NE/1r



Jack Albritt, Project Manager  
Bureau of Land Management  
Royal Gorge Resource Area  
P.O. Box 1470  
Canyon City, Co. 81212

October 15, 1982

Sir:

This letter contains comments regarding the BLM evaluation of lands for wilderness inclusion/exclusion in the Royal Gorge Resource Area.

I wish this letter to be made part of the hearing records for the hearings which took place Oct. 12-14, 1982.

The undeveloped land remaining in the United States is fast diminishing. As our population increases there is a need for the therapeutic and recuperative experiences that are provided by open spaces in a wilderness state. Many psychologists have recognized the benefits of wilderness experiences on our urbanized lives.

Natural resources are of great concern today. There has been an emphasis on the mineral, timber and grazing resources to the exclusion of genetic resources. Genetic diversity is a resource that will provide great benefits to our technological future if those resources are still to be found when research is ready for them. Our genetic resources are provided by wilderness lands; although it is only part of what wilderness lands provide.

Please consider my following comments on these specific units of BLM land considered for inclusion or exclusion as wilderness. Also, please keep in mind that these BLM lands represent the last wild desert and canyon lands in Colorado, unduplicated by existing alpine wilderness.

BEAVER CREEK: I support Alternative C which includes all of the original acreage except for 3 hard-to-manage spurs and a heavily-used area. I prefer preferred Alt. D which eliminates 4000 acres south of Holbert drainage, on the grounds that this section is an integral part of the larger Beaver Creek ecosystem whose timber values are far outweighed by backpacking, wildlife genetic diversity, and other wilderness values.

BROWN'S CANYON: I wholeheartedly support the BLM wilderness recommendation for the full 6,614 acres of this unit, especially since it will allow future consideration of Brown's Canyon and the contiguous wild Aspen Ridge Forest Service area as a jointly named wilderness area. I wish to point out that the terrain here is too rugged to make timber and minerals production economical.

SAND CASTLE: I affirm BLM's wilderness recommendation for this very small 1,644 acre area, which will round out the adjacent Great Sand Dunes National Monument.

43-14

RESPONSE TO LETTER 43-14

Thank you for your letter.

43-14

UPPER AND LOWER GRAPE CREEK: I strongly oppose BLM's non-wilderness recommendation on the basis that the DEIS emphasizes timber, grazing, minerals, and ORV potential to the detriment of natural attributes such as raptor habitat and species diversity. Minerals potential is cited as a basis for exclusion despite the Coker minerals study which concludes the area has 'little economic potential'. The DEIS is framed in negative terms. For example: it says that wilderness designation will lead to 'losses in potential increases' of livestock, timber and motorized recreation. Wilderness benefits are virtually ignored. I strongly recommend inclusion of both areas, Upper and Lower Grape Creek, with the exception the the Sunset Gulch section of Lower Grape Creek, and a small SE section of Upper Grape Creek containing inholdings.

SAN LUIS HILLS: Despite recent interest in the copper and molybdenum potential of this unit, these values are FAR outweighed by the fact that San Luis Hills is one of only 2 Colorado units representing the 'fescue mountain mully prairie vegetation class' and therefore provides a rare addition to the National Wilderness Preservation System. Similar minerals are found nearby whereas the unique geologic and plant values of this unit are irreplaceable. I STRONGLY RECOMMEND INCLUSION OF SAN LUIS HILLS unit minus the heavily mineralized NE section deleted in Alternatives C and D.

MCINTYRE HILLS: Intensive management of this area for rangeland, timber and ORV use has been long planned. Because these values in this area are higher than its wilderness values compared with the other units, I concur with the BLM's non-wilderness recommendation for this area.

Thank you for your attention.

*Gregory C. Linkley*

Jack Albright, Project Manager  
Bureau of Land Management  
Royal Gorge Resource Area  
P.O. Box 1470  
Canon City, Co. 81212

October 15, 1982

RESPONSE TO LETTER 44-15

Sir:

Thank you for your letter.

This letter contains comments regarding the BLM evaluation of lands for wilderness inclusion/exclusion in the Royal Gorge Resource Area.

I wish this letter to be made part of the hearings records for the hearings which took place Oct. 12-14, 1982.

The undeveloped land remains in the United States is fast diminishing. As our population increases there is more need for the therapeutic and recuperative experiences that are provided by open spaces in a wilderness state. Many psychologists have recognized the benefits of wilderness experiences on our urbanized lives.

Natural resources are of great concern today. There has been an emphasis on the mineral, timber and grazing resources to the exclusion of genetic resources. Genetic diversity is a resource that will provide great benefits to our technological future if those resources are still to be found when research is ready for them. Our genetic resources are provided by wilderness lands, although it is only part of what wilderness lands provide.

Please consider the following comments on these specific units of BLM land considered for inclusion or exclusion as wilderness. Also, please keep in mind that these BLM lands represent the last wild desert and canyon lands in Colorado, undisturbed by existing alpine wilderness.

**BEAVER CREEK:** I support Alternative C which includes all of the original acreage except for 3 hard-to-manage spurs and a heavily-used area. I oppose preferred Alt. D which eliminates 4000 acres south of Holbert drainader on the grounds that this section is an integral part of the larger Beaver Creek ecosystem whose timber values are, for outweighed by backwacking, wildlife genetic diversity, and other wilderness values.

**BROWN'S CANYON:** I wholeheartedly support the BLM wilderness recommendation for the full 4,614 acres of this unit, especially since it will allow future consideration of Brown's Canyon and the contiguous wild Aspen Ridge Forest Service area as a jointly managed wilderness area. I wish to point out that the terrain here is too rugged to make timber and minerals production economical.

**SAND CASTLE:** I affirm BLM's wilderness recommendation for this very small 1,644 acre area which will round out the adjacent Great Sand Dunes National Monument.

44-15

**UPPER AND LOWER GRAPE CREEK:** I strongly oppose BLM's non-wilderness recommendation on the basis that the DEIS emphasizes timber, grazing, minerals, and ORV potential to the detriment of natural attributes such as raptor habitat and species diversity. Minerals potential is cited as a basis for exclusion, despite the Coker minerals study which concludes the area has 'little economic potential'. The DEIS is framed in negative terms. For example: it says that wilderness designation will lead to 'losses in potential increases' of livestock, timber and authorized recreation. Wilderness benefits are virtually ignored! I strongly recommend inclusion of both areas, Upper and Lower Grape Creek, with the exception the the Sunset Gulch section of Lower Grape Creek, and a small SE section of Upper Grape Creek containing inholdings.

**SAN LUIS HILLS:** Despite recent interest in the copper and molybdenum potential of this unit, these values are FAR outweighed by the fact that San Luis Hills is one of only 2 Colorado units representing the 'fescue mountain subhigh prairie vegetation class' and therefore provides a rare addition to the National Wilderness Preservation System. Similar minerals are found nearby, whereas the unique geologic and plant values of this unit are irreplaceable. I STRONGLY RECOMMEND INCLUSION OF SAN LUIS HILLS unit minus the heavily mineralized NE section deleted in Alternatives C and D.

**MCINTYRE HILLS:** Intensive management of this area for rangeland timber and ORV use has been long planned. Because these values in this area are higher than its wilderness values compared with the other units, I concur with the BLM's non-wilderness recommendation for this area.

Thank you for your attention

*Andy Rowell*  
*Elizabeth Stewart*  
*Halley Barker*  
*Keith Brown*

Barbara \* Whipple

BOX 609 • BUENA VISTA • COLORADO • 81211  
Studio: 429 East Main Street Telephone: 303-395-6291

RESPONSE TO LETTER 45-16

22 Oct. 1982

Thank you for your letter.

Dear Mr. Albright,

I could not attend the hearings Oct. 12 or 13,  
and I want to go on record in supporting the  
Brown Canyon Wilderness Area.

In spite of the fact a railroad goes thro  
this area, it is a spot which should be  
protected against additional mechanical  
encroachment. I know there are ruins in  
Mc Canyon which also need protection.

Thank you

Barbara Whipple

46-17

GERNOT HEINRICHSDORFF  
Landscape Architect

25 October 1982

RESPONSE TO LETTER 46-17

Mr. Jack Albright, Project Manager  
Bureau of Land Management  
Royal Gorge Resource Area  
P.O. Box 1470  
Canon City, CO 81212

Dear Mr. Albright:

We are writing in response to BLN proposals for Wilderness Study Areas  
in the Gargon City area, and we request that our comments be included in  
the hearing record.

We congratulate the BLN's support for the wilderness designation of Brown's  
Canyon, where we have enjoyed many a hike and ra't trip, and for the Sand  
Castle area adjacent to the Great Sand Dunes. And we do not oppose  
intensive management for McInyre Hills, as BLN proposes.

However, we oppose the non-wilderness recommendation for Upper and Lower  
Cape Creek. The Oaker study stated that the area has "little mineral  
potential"; the area has rich natural assets in diverse wildlife habitat.  
We oppose mineral, livestock, timber or motorized-recreation uses of the  
Cape Creek area.

Also, the special geologic, botanical and habitat assets of San Luis Hills  
are irreplaceable and unique in Colorado. Minerals found here are also found  
in private holdings nearby. We urge the inclusion of this land in the Wilderness  
System except, perhaps, for the northeast section.

For Beaver Creek we support Alternative C and oppose alternative D. The  
wilderness values here, too, far outweigh timber values.

Once lost, wilderness qualities and values cannot be regained. No "national  
emergency" prompts the opening of wilderness lands to development or motorized  
recreation. The short-range profit of a few companies does not justify the  
irrevocable destruction of wilderness remnants. The demand for wilderness as  
wilderness, for study, research and recreation, increases and accelerates  
continuously as population increases. Preservation of wilderness is crucial.

Thank you for your consideration.

Sincerely yours,  
Gernot Heinrichsdorff  
Gernot Heinrichsdorff  
Ave. Heinrichsdorff



Oct. 30, 1982  
P.O. Box 717  
Siena Vista, Co. 81211  
Phone: 395-8426

RESPONSE TO LETTER 47-19

Jack Albright  
Bureau of Land Management  
Royal Gorge Resource Area  
P.O. Box 1470  
Canon City, Colo. 81212

Thank you for your letter.

Dear Mr. Albright:

Our group was formed in 1979 to monitor the status of wild areas on public lands in our region. I wish to express support on behalf of our 50+ membership for wilderness designation of the 6,514 acre Brown's Canyon unit. This unique wild area is an important refuge for wildlife, receives very little human pressure and would be a valuable addition to the wilderness preservation system. The life zones and ecosystems contained in the Brown's Canyon unit are not preserved anywhere else in our region.

I request that this letter be included in the hearing record.

Sincerely,

*Dick Scar*  
Dick Scar

48-20

3290 Darley Ave.  
Boulder, Colorado 80303  
October 30, 1982

Jack Albright, Project Manager  
Bureau of Land Management  
Royal Gorge Resource Area  
P.O. Box 1470  
Canon City, Colorado 81212

RESPONSE TO LETTER 48-20

Thank you for your letter.

Dear Mr. Albright,

I am writing to urge BLM wilderness recommendation of more of the Canyon City SLM WSA; I believe that some that were found unsuitable as wilderness have been considered more on the basis of their timber, grazing, minerals, and ORV use potential than for their wilderness values. I request that this letter be made part of the public hearing record on the recommendations contained in the Draft EIS.

For Beaver Creek, I support Alternative C and oppose Alternative D, eliminating 4000 acres; these 4000 acres south of Holbert drainage are an integral part of the larger Beaver Creek ecosystem.

I wholly support BLM's recommendation for Brown's Canyon timber and minerals production is not economical on such rugged terrain. I also support wilderness recommendation for the tiny Sand Castle area, rounding out the Great Sand Dunes National Monument.

I urge you to recommend wilderness designation for Upper and Lower Gorge Creek and San Luis Hills, to preserve the areas' natural attributes, their unique geologic, plant, and animal values which make them irreplaceable areas. I approve deletion, however, of the heavily mineralized NE section of San Luis Hills, as in Alternatives C and D. I also approve of the intensive management planned for McIntyre Hills, for range, timber, and ORV use.

Sincerely,

*Deborah Hayes*  
Deborah Hayes

5-42

1. Nov, 1982

Dear Mr. Albright,

RESPONSE TO LETTER 49-21

Thank you for your letter.

I write in response to the Canon City District's preliminary discussion on wilderness designations for that area. I wish to make my suggestions part of the hearing record, and appreciate the opportunity to do so.

I applaud the BLM's decision to recommend Beaver Creek and Bonni's Canyon; however I wish to see that Sand Creek, an adjacent piece, Upper and Lower Cuyaca Creek and San Luis Mts become wilderness also.

In talking with other people I find that the term "wilderness" is outdated and perhaps not appropriate for some districts. BLM lands. These people would prefer "wild land resource" or another such term. In times when everything is a resource - coal, oil, water, and even air - I suppose the idea is not so

1

## 49-21

extraordinary and, indeed, the BLM bases their evaluations of an area on timber, mineral or wilderness resource value. However, I feel we should still use the term "wilderness" and fully understand what it means for the "lower 48". It means a sitting aside of lands that are primarily undisturbed and untrammeled by man. And once the passage of FLPMA, the BLM had to look for such lands within its holdings. They do exist and here's proof in your decision to recommend Beaver Creek and Bonni's Canyon. I've worked on BLM lands and have found a solitude and haunting serenity unlike those found on high mountain tops where so many other people wish to be. These BLM lands promise a reservoir of near pristine lands unique in terms of their particular ecosystem. They promise a new recreational avenue for those overcome by crowds in the alpine wildernesses. They promise a redistribution of wilderness. For these reasons I wish to

2



49-21

I thank you for the opportunity to  
comment on the crucial recommendations  
leading up to the final decisions on  
our BLM wilderness.

Sincerely,

Lynn Gullip

50-22

RESPONSE TO LETTER 50-22

Thank you for your letter.

11/2/82



BOX 1032, BUENA VISTA, COLORADO 81211

"The Whitewater Capital of Colorado"

(303) 395-8949 or (303) 395-6657

Dear Jack,

We strongly support wilderness designation for Brown's  
Canyon (all 614 acres). Not only would it offer  
protection and continued recreation of a primitive  
nature which is different in scope than the nearby  
Collegiate Peaks area, but it would help the  
tourist business in Chaffee County.

We also support alternative C for the Beaver Creek  
area, your wilderness recommendation for Sand Creek,  
wilderness designation for upper and lower Grape Creek  
excluding the Sunset Blvd section and the SE section of  
Upper Grape Creek containing inholdings, and  
San Luis Hills since it is one of only 2 Colorado  
units representing the "Fescue mt. mchly prairie  
vegetation class.

Please make our letter part of the hearing  
record.

Sincerely,

Reed & Karen Dillo



## Enos Mills Group Sierra Club

2239 East Colfax, #206  
Denver, Colorado  
80206 (303) 321-6292

Jack Albright, Project Manager  
Bureau of Land Management  
Royal Gorge Resource Area  
P.O. Box 1470  
Canon City, CO, 81212

Dear Mr. Albright,

The Enos Mills Group of the Sierra Club has 3000+ members in the Denver Metro area, the great majority of whom use and value wilderness and are constantly alert for new wilderness use opportunities. We are concerned about BLM's Wilderness Study Areas in the Royal Gorge Resource Area for the following reasons:

- 1) These areas are among the closest WSA's to Denver, since most are within 3 hrs. driving distance.
- 2) If finally designated and protected as Wilderness, these areas would preserve for dispersed, primitive, non-motorized recreational use a particular topographical-ecological category of land which, though common in the near-Denver Front Range, is not available in great quantity or in Wilderness quality for public use. This despite strenuous efforts by local groups in Jefferson and Boulder Counties to set aside Open Space and despite the existence of a 4% sales tax in Jefferson County to achieve this purpose. The willingness of citizens to tax themselves (which has survived at least two elections) to preserve lands of the type in the RD RA DEIS should be a signal to the BLM that their recreational value may be considerable, if perhaps not well developed at present.
- 3) Our Group believes that we need more Wilderness in Colorado in general, not only for the benefit of our members, but also for the benefit of those distant in space and time. Future generations, or people in other states who do or might visit Colorado Wilderness Areas, do not generally have the opportunity to comment on the DEIS. On the other hand, parochial economic interests make their views known constantly. Remember, these are National public lands.

-2-

51-24

### Positive comments on the DEIS as a whole.

We are pleased with the experimental large format, graphics, and overall appearance. You could perhaps have used more flattering pictures - why not contact the Club or the Colorado Open Space Council for better ones? The range of alternatives studied in the DEIS is also fairly good, and, with some exceptions, the discussion of the conflicts, resources, and opportunities is fairly accurate.

### Negative comments on the DEIS as a whole.

We are disappointed that the BLM has proffered such a meager, and ill-deserved, wilderness recommendation for the RGRA. The percentage of land recommended is suspiciously very similar to that arbitrary elsewhere (e.g. Lake City area) and appears to be more capricious than rational. BLM appears to be straining to make such "resource mountains out of molehills" and to use such high dollar figures for what surely are fairly speculative resources, that hard-to-quantify resources like Wilderness are made to seem unimportant by comparison. With one or two exceptions, minerals do not appear to be economically important resources in these areas, (as the DEIS itself makes fairly plain), yet conclusions drawn from these data are prejudicial to Wilderness. The same is true for timbering; the DEIS (and personal observation) indicates that rainfall is slight and uneven, soils are thin, and slopes are steep, - hardly land suitable for a significant sustainable timber harvest, - yet timber harvest is considered to be a substantial barrier to Wilderness recommendation. Finally, and most galling, wildlife "enhancement" is used as another stick to beat Wilderness. The Sierra Club believes that when one considers all wildlife species (i.e. an ecosystem), not just a handful of game species, wildlife benefits most from the undisturbed, "unmanipulated" land in a designated Wilderness.

### Positive comments on the DEIS specifically.

We agree with, and loud, BLM for recognizing the Wilderness qualities at Bowdoin Canyon, Sand Castle and the Enos Mills WSA's. We agree that these areas have few conflicts or management complications and would complement Federal land use policies in adjoining areas. We also agree with BLM (somewhat reluctantly) on its preferred alternative for the McIntyre Hills WSA. The resource conflicts, though not huge, indeed appear to be more substantial than in other areas, and the Wilderness resource is not so great as to overwhelm them.

We also agree with some of BLM's deletions:

- 1) in Beaver Creek, alternative C, all these deletions seem reasonable, although we have not had the opportunity to explore the northeast and western deletions.
- 2) in Upper Grape Creek, alternative C, the small square section on the southeast side.

### RESPONSE TO LETTER 51-24

#### Response 1

Although it is necessary to show all the impacts that would occur as a result of wilderness designation or nondesignation, in this FEIS the impacts shown in Chapter 4 are not judged to be significant nor insignificant and no dollar values have been estimated in this FEIS. The information is shown and comparisons are given so that the readers can form their own opinions. Timber and wildlife habitat improvements are not identified as "barriers" to wilderness but are analyzed to examine effects of alternative resource uses.

5-45

- 4) in San Luis Hills, the northeastern section deleted in Alternative C.
- 5) we also believe that in Brown's Canyon, BLM should examine the WSA boundaries in the vicinity of Ruby Mtn. on the extreme NW edge (around Cathrop). This area is used for ORV and rock-collecting recreation, so perhaps the boundary should be drawn to omit it.

We disagree with the rest of BLM's deletions as follows:

- 1) In Beaver Creek, the 4000 acres south of the Holbert drainage, but excluding the deletion in Alternative C. Because most of this area is bounded by Colorado DOW property, it would be best managed for Wilderness. We do not believe that the fuel-wood and saw timber resource is so great as to justify the exclusion of a type of lower-lying sedimentary rock landscape that complements the basement rock landscape of the rest of the WSA. It's also not clear to us how the wood could be gathered without affecting DOW's uses of the adjoining land.
- 2) The total exclusion of both Upper and Lower Grape Creeks removes from Wilderness two areas which are in fact Wilderness quality, with minor conflicts, and which in fact should be managed together as one unit (the way dividing the units is a source of local ORV aggravation and should be closed off). The exclusion of the areas in Lower Grape Creek west of Goat Park Gulch and around Horseshoe Mtn. in Alternative C because of some small patented land strikes us as unnecessary, and in the latter case deletes from Wilderness a scenic area near the Tights. These areas do not seem to be used for any particular economic purpose now and we would urge BLM investigate the possibility of removing these conflicts through land exchange. The NE exclusion in Alternative C for Upper Grape Creek is not necessary also; information to us suggests that ORV conflicts in this area are not as great as the DEIS claims. The other alleged conflicts are not such as to overwhelm the Wilderness qualities of these two areas. In particular, the conflict of the cattle fencing project for Grape Creek is best dealt with by reducing the AUM, not by spending additional public monies correcting impacts due originally to the subsidy of a marginal local industry.
- 3) The total exclusion of San Luis Hills because of one legitimate and another questionable conflict is not justified. The NE exclusion in Alternative C seems reasonable to us because of mining conflicts, but we are not convinced that managability problems for the southern exclusion are convincing. The San Luis Hills is important, as Wilderness, because it preserves for that purpose low altitude land of some uniqueness in that part of Colorado.

In conclusion, we do not believe that BLM has justified the removal of such a high percentage of acreage from its Wilderness recommendations. From both direct and indirect information available to us, and from the discussion in the DEIS itself, we are driven to the conclusion that BLM's recommendations are essentially arbitrary and, perhaps, motivated more by politics than by proper

land use considerations.

Sincerely,

*Kirk Cunningham*  
Kirk Cunningham  
Conservation Chair

KC/kr

52-25

November 8, 1982

DR. SALLY STEWART

8220 DELMONICO DRIVE, APT. 224 • COLORADO SPRINGS, COLORADO 80918

Mr. Jack Albright  
Project Manager, Bureau of Land  
Management  
Canon City, Colorado 81212

Dear Mr. Albright:

RESPONSE TO LETTER 52-25

I am writing to express my deep concern about the proposals to reclassify Colorado Wilderness areas as "nonwilderness" and thus to open up these areas to oil and gas leasing and development. I am particularly concerned about the Beaver Creek, Brown's Canyon, Sand Castle, Grape Creek, San Luis Hills, and McIntyre Hills areas.

Thank you for your letter.

I have lived in Colorado much of my life and spent many hours hiking and backpacking with friends and relatives in Colorado Wilderness areas. The pleasure I have received over the years from these activities can not be measured in dollars and cents. Yet I greatly fear that many of our legislators, administrators, and land developers are bringing pressure to bear on the Bureau of Land Management to change these Wilderness designations to fatten their own purses and without due consideration to the aesthetic and recreational values of these areas for the general populace. We have seen this happen before and, unless those people with limited power and influence can band together to stop this process, it will happen again and again. Colorado is one of the few states left in this country that can be proud of its natural beauty because it has fought hard to preserve it. I sincerely hope that this fight will not be lost.

I would appreciate it if my comments are included as a part of the hearing record.

Sincerely,

*Sally Stewart*  
Sally Stewart

53-26

Jack Albright  
Project Manager  
Bureau of Land Management  
Royal George Resource Area  
P.O. Box 1470  
Canon City, Co 81212

RESPONSE TO LETTER 53-26

Dear Mr. Albright:

Thank you for your letter.

I was unable to attend the Bureau of Land Management hearings held here in Colorado Springs but do wish to voice my opinion on the matter.

My feelings are in total support of the Sierra Club. The Areas proposed for wilderness protection by the NPS and Forest Service fall far short of the areas needed. All of the congressional designated study areas need to be made wilderness areas and there protection from James Watt guaranteed.

The critically balanced Western environment must be protected so that future generations can enjoy the beauty and love of the land that our forefathers did.

Please make these comments part of the official hearings records.

Thank you,  
*Duane Jensen*  
Duane Jensen  
2815 Fairbridge Dr  
Colorado Springs, Co 80907

5-47

54-27

Mr. Jack Albright, Project Manager  
Bureau of Land Management  
Royal Gorge Resource Area  
P.O. Box 1470  
Canon City, CO 81212

RESPONSE TO LETTER 54-27

Dear Mr. Albright:

Thank you for your letter.

In regards to the wilderness recommendations your office will make for the BLM Study areas for the Canon City District, I would like to provide these comments. The primary values of naturalness, beauty, solitude and recreation will become more evident as our per capita ratio becomes higher, and the total amount of this land diminishes. Also the natural ecosystems will be needed for future cultural and scientific studies.

I have personally visited the Beaver Creek, Brown's Canyon, and either been in or adjacent to Upper Grape Creek Area. They are all worthy of Full Wilderness Designation, especially in light of how many other areas which will be developed because they are too small. Please recommend these four areas, including the additional 4000 acres in Beaver Creek. This is a special river, with fine fishing and wildlife habitat, which will never be the same if it is not protected. I feel that little timber resources can justify opening these areas to development.

Again please recommend the above mentioned areas and McIntyre Hills for Wilderness. Their value close to Colorado Springs and Pueblo are a strong reason for their needs. Please include this letter as part of the hearing record. Thank you for the opportunity to comment, and am copies to whoever would also want to read them.

Sincerely,

*Sam C. Finkle*  
Peter C. Finkle

November 8, 1982  
1007 U.S. Hwy 101 #12  
Garden, Co. 80401 55-28

Jack Albright, ARM  
831 Royal Gorge Blvd.  
PO Box 1470  
Canon City, Colorado 81212

Dear Mr. Albright:

On October 14, 1982, I testified at Colorado Springs on the DEIS proposals for Upper Grape Creek and Lower Grape Creek.

Enclosed is a more detailed response which includes points I noted at the hearing and recommendations to be considered in the Final Environmental Impact Statement.

I would like my response to be made part of the formal Hearing Record.

Thank you for the opportunity to comment.

Sincerely,

*Willie Johnson*

RESPONSE TO THE BUREAU OF LAND MANAGEMENT  
DRAFT ENVIRONMENTAL IMPACT STATEMENT

ON

UPPER AND LOWER GRAPE CREEK

by

Willie Johnson  
October 1982

-2-

I. INTRODUCTION

Hello, my name is Willie Johnson. I live in Golden, Colorado. I would like to thank BLM for the opportunity to comment. I would like to speak about Upper and Lower Grape Creek, an area I have become familiar with in the past five months including visiting both areas.

Seven Wilderness Study Areas (WSA) totaling 82,867 acres have been identified by the Bureau of Land Management (BLM) in the Canon City District of south central Colorado. Of this area, 25,250 acres are proposed to be recommended for inclusion in the National Wilderness Preservation System.

Neither Upper Grape Creek nor Lower Grape Creek is being recommended for inclusion. These comments address the appropriateness of this recommendation.



## II. EVALUATION OF 'NON-WILDERNESS' RECOMMENDATION

BLM's recommendation of both Upper and Lower Grape Creek for "non-wilderness" is somewhat confusing given that both WSA's clearly meet the criteria of "wilderness" as outlined by the National Wilderness Act. Using BLM's interpretation of those criteria, and the data presented in the DEIS, both WSA's qualify as "wilderness".

The BLM in the Federal Register (Vol. 47, No. 23, February, 1992) outlines Wilderness Study Policy, Policies, Criteria, and Guidelines for Conducting Wilderness Studies on Public Lands. All BLM wilderness recommendations for "suitable" or "non-suitable" are justified on the following criteria:

1. Evaluation of wilderness values which include mandatory wilderness characteristics, special features, multiple resource benefits, and diversity in the National Wilderness Preservation System; and
2. Manageability.

## 1. EVALUATION OF WILDERNESS VALUES which include:

- a. **Mandatory Wilderness Characteristics** - size, naturalness, and outstanding opportunities for solitude or primitive recreation (F.R. p. 5103). The Natural Wilderness Act requires that an area be at least 5000 acres. Assuming all-wilderness designation, Lower Grape Creek is 11,700 acres and Upper Grape Creek is 10,200. "Naturalness" refers to an area which "...generally appears to have been affected primarily by the forces of nature with the imprint of man's work substantially unnoticeable" (F.R. p. 5105). The DEIS (p. 36) states in reference to Lower Grape Creek, "There are several imprints of man within this area. However, most of the imprints are historical and do not detract substantially from naturalness or solitude." Referring to Upper Grape Creek, the DEIS notes, "...the only imprint is an old mine site with tailings. The site is beginning to grow over, is screened by topography, and is not a major imprint."

Opportunities for solitude and primitive and unconfined recreation as defined in Section 2(c) of the Wilderness Act is interpreted by BLM (F.R. p. 5105) to include: size and configuration; topographic screening; vegetative screening; presence of outside sights and sounds; and ability of user to find a secluded spot. The DEIS (p. 36) referring to Lower Grape Creek, states, "Opportunities for primitive recreation are readily available - hiking, horseback riding, photography, backpacking, fishing... The topography in addition to the vegetation in some locations provide this unit with screening from sights and sounds outside the unit. Due to these factors this unit has opportunities for solitude." Referring to Upper Grape Creek, the DEIS (p. 42) notes, "Opportunities for primitive recreation are available - hiking, horseback riding, backpacking, fishing... The remote location of this unit and the absence of transportation routes around the perimeter also serve to contribute to solitude value."

- b. **Special Features** - including ecological, geological or other features of scientific, educational, scenic, or historical value. (F.R. p. 5103) Part of the BLM interpretation of the above includes, "...these features are not mandatory for an area to be recommended as suitable for wilderness designation. However, as part of the wilderness study process, should also be thoroughly considered when assessing an area's overall value as wilderness." With reference to Lower Grape Creek, the DEIS (p. 36) notes that the Narrow Gauge Railroad is a special feature because of the historical significance. For Upper Grape Creek, the DEIS (p. 42) states, "Historical development in the unit consisted of mineral prospecting, mining, railroading, agriculture and livestock grazing, and recreation use. Prehistoric values are given minimal consideration in the DEIS, which states, 'According to the Royal Gorge Resource Area WSA preliminary resources in this WSA are not significant. Little information exists on which to make definitive statements concerning this prehistory.' Not only is prehistory not 'highly considered' as required by the BLM guidelines, this is an example of unequal weight given to wilderness values."

- c. **Multiple Resource Benefits** - The benefits to other multiple resource values and uses which wilderness designation of the area could ensure. These may include protection of watersheds, water yield, and water quality; protection of wildlife habitat; preservation of natural plant communities; preservation of cultural and archaeological resources; and protection of scenic quality and natural values (F.R. p. 5106). For both Upper and Lower Grape Creek, according to the DEIS, air quality is Class II, and both units provide habitat for mule deer, mountain lion, black bear, and small birds and mammals. Several species of raptors are found in the area. The non-gene biologist for the Colorado Department of fish and Wildlife in Canon City noted that a golden eagle nesting site, though not occupied, is near Doveson Reservoir near Upper Grape Creek. Water quality for both units are described as "good except during periods of flash floods." (DEIS p. 35,42)

- d. **Diversity in the National Wilderness Preservation System** - considering the following factors:

- (1) Expanding diversity of ecosystems and landforms.
- (2) Assessing opportunities for solitude or primitive recreation within a days driving time of major population centers.
- (3) Balancing the geographic distribution of wilderness areas including Federal and state lands designated as wilderness or under study. (F.R. p. 5103)

In addressing diversity of ecosystems, the DEIS (p. 36,42) states that the ecosystem of pine-Douglas fir forest is common to the surrounding region. Other parts of the ecosystem

## RESPONSE TO LETTER 55-28

Response 1

A Class I (existing data) inventory was performed and is considered to be sufficient basis to estimate the importance of the cultural resources in the WSAs.

Nowhere in the Wilderness Study Policy (Federal Register, Vol. 47, No. 23) is a level of documentation mentioned for cultural (prehistoric) values.

It should also be noted that development on public lands requires inventory and mitigation for cultural resources, thus providing legal protection, which occurs whether or not an area is designated as wilderness.

in Grape Creek such as flower communities and landforms of which Lower Grape Creek is significant are not mentioned. Both units can be reached within one day (five hours) from six major population centers: Denver, Colorado Springs, Pueblo, Boulder, Fort Collins, and Greeley (DEIS, p. 36). The geographical distribution of the WSA's is not directly addressed in the DEIS.

## 2. MANAGEABILITY

According to BLM (F.R. Vol. 47, No. 23, p. 5107) the area must be capable of being effectively managed to preserve its wilderness "in the long term". Factors considered here include land status (private inholdings, state lands, valid mining claims, mineral leases, and overall pattern of land status); access to state of private inholdings which means access to non-federal lands surrounding the WSA; use of buffer zones (BLM policy not to use buffer zones; air quality - no reclassification from class II).

According to the DEIS (p. 5-6) wilderness designation for Lower Grape Creek "could" restrict access to 87 mining claims and 75 acres of non-federal inholdings. Lower Grape Creek, restrictive access "could" impact thirty acres of non-federal inholdings and 148 existing mining claims. As previously noted, the DEIS does not clarify how "active" these claims are. According to BLM mining engineer Bob Coker (Coker, p. iv), the whole area is "subeconomic" from a mineral standpoint.

Both Upper and Lower Creeks have access. Lower Grape Creek from Temple Canyon Park and Upper Grape Creek from Lower Grape Creek. There is also a road down Bear Gulch which crosses private land. The landowner allows passage with his permission. Also access to Upper Grape Creek via Sweeney Reservoir is possible.

Neither Upper Grape Creek nor Lower Grape Creek need a buffer zone. Lower Grape Creek has its own natural buffer zone - the canyon. Upper Grape Creek is isolated such that a buffer zone is not needed.

Air quality for both Upper and Lower Grape Creek is rated by BLM as class II. The DEIS states that air quality in both units is "good".

In summary, without considering outside data, there is adequate data in the DEIS to qualify both units as "wilderness" using BLM's interpretation of the criteria of the National Wilderness Act.

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## 55-28

### III. WEAKNESS OF THE DEIS

Though the DEIS is fairly comprehensive, there are several areas which are inadequate. Two areas which are inadequate are insufficient documentation of minerals and supplemental values and failure to give equal weight to wilderness values.

#### 1. LACK OF ADEQUATE DOCUMENTATION IN THE FOLLOWING AREAS:

a. Minerals - First, the DEIS fails to clarify the nature of the valid mining claims in Upper and Lower Grape Creek. Reference is made in the DEIS to the number of mining claims and non-federal inholdings without clarifying how active or inactive the claims are.

Secondly, one of the major sources used for mineral documentation, Robert Coker's mineral assessment of the area, emphatically states the lack of mineral potential in the area. In Coker's "Summary and Conclusions", he states, "...at current March, 1982 metal prices, the entire area is considered subeconomic. Overall the entire area has little economic potential. The mineral occurrences are small and, though locally of fairly high grade, are generally low grade in character."

#### b. Supplemental Values

Mineral consideration is given to pre-historic values. The DEIS (p. 35) claims that pre-history resources are "not significant", according to the Roper Gorge Resource Area URA. Very limited consideration is given to historical, ecological, and scientific values. The DEIS (p. 35) states, "...little information exists on which to make definitive statements concerning this pre-history". This is clearly a lack of documentation which does not comply with BLM guidelines for documentation in the Wilderness Study Process as outlined in the Federal Register (46, 47, No. 23, pp. 5111-5143).

#### 2. FAILURE TO GIVE EQUAL WEIGHT TO WILDERNESS VALUES AS COMPARED TO NON-WILDERNESS VALUES

According to BLM guidelines for conducting wilderness studies, equal weight must be given to wilderness values, as stated in the Federal Register (Vol. 45, No. 15, 8379): "The same weight must be given to the assessment of impacts on identified wilderness values when an area is recommended as non-suitable as is given to the analysis of impacts resulting from wilderness designation when an area is recommended suitable".

There are several ways in which wilderness values are given unequal weight in the DEIS. First, pre-existing management plans for Grape Creek indicate a bias toward wilderness values. Specifically, the BLM planning tool, the Management Framework Plan (MFP) of the Roper Gorge Planning Unit (46 FR(212)) clearly expresses a non-wilderness bias stating, "...it is projected that the trail along Grape Creek will be a hiking/motorized bike trail.... Such a trail would help overcome a supply

## Response 2

As long as the claimant files an annual assessment showing that a minimum of \$100 of labor or development per year per claim was expended in the development of the mineral resource, the claim is considered active. The claims shown in each WSA have all had annual assessments filed and are considered active at the time this EIS was written.

## Response 3

Emphasis has been placed on item 8 of the summary and conclusion section of the "Mineral Resources of the Arkansas Canyon Planning Unit with Special Emphasis on the Grape Creek Wilderness Study Areas and the McIntyre Hills Wilderness Study Area," by Robert Coker. In its complete context, item 8 states "Overall the entire area has little economic potential. The mineral occurrences are small and though locally of fairly high grade, (emphasis added) are generally low in character." This would indicate that in considering the entire 225-square-mile area the prospects for discovery of significant mineral resources are generally low; however, the potential is identified in both the Coker report (introduction and conclusion/summary) and the Barringer Resources investigation. In particular the following areas within and adjacent to the Lower Grape Creek WSA were identified as having mineral potential: Green Mountain Mine; 2) Copper Gulch; 3) Horseshoe Mine; 4) Goat Park; 5) Sunset City; 6) El Plomo Mine; 7) Columbine Mine; 8) Copper Girl and Valley View. Although currently delineated ore reserves are inadequate to engage in active developments at this time, the potential for development and discovery is quite evident in Lower Grape Creek. The developed workings identified in the Coker reports are for the most part confined to the upper oxidized portion of the deposit and very little is known concerning the mineralization at depth. For these reasons and the favorable depositional environment of the area as identified by E. W. Heinrich in "Precambrian Tungsten and Copper-Zinc Skarn Deposits of South-Central Colorado" the area was identified as having potential for mineralization.

It should be reiterated that the Lower Grape Creek WSA was the only WSA identified to have mineral potential; Upper Grape Creek and McIntyre Hills were identified as having only limited potential, which is in agreement with the references cited.

#### Response 4

A Class I (existing data) inventory was performed and is considered to be sufficient basis to estimate the importance of the cultural resources in the WSAs.

Nowhere in the Wilderness Study Policy (Federal Register, Vol. 47, No. 23) is a level of documentation mentioned for cultural (prehistoric) values.

The State Historic Preservation Officer is in concurrence with our approach (see Letter 16-95 and Chapter 1).

It should also be noted that development on public lands requires inventory and mitigation for cultural resources, thus providing legal protection, which occurs whether or not an area is designated as wilderness.

#### Response 5

We have clarified and added more discussion on wilderness values in Chapter 4 in the FEIS. Also the no wilderness alternative discusses the number of acres and what wilderness values would be affected if a WSA were not designated wilderness.

Although the DEIS did show losses of potential increases, this FEIS only shows direct losses or increases. This analysis is consistent among all resources in each WSA.

ORV use is currently quite low in these WSAs and is not projected to increase if the areas are not designated wilderness. The potential motorized trail along Grape Creek is no longer considered in the FEIS. Virtually all of this use would continue to occur on existing ways and trails. There is no discernible erosion or sedimentation presently expected. Consequently this has not been analyzed in detail but is addressed in Chapter 1.

deficiency for motorized trails in Region B... Because the Grape Creek Corridor is recommended to be managed as semi-private motorized. This recommendation meets the management criteria of this class... Because of the winding nature of the canyon, noise generated by the motorbikes would be but a brief intrusion... Consequently, the current EQ class should be altered and managed entirely according to the semi-private motorized criteria...".

The date of the MFP is April, 1975. I suggest that there is a direct relationship between the pre-existing "non-wilderness" management plans and the way in which wilderness values are viewed in the DEIS.

Another way in which non-wilderness values are given higher weight is by ignoring "losses" and "potential losses" of non-wilderness designation. The DEIS focuses on "losses" and "potential losses" of non-wilderness values such as "geology and minerals" "wildlife", and "forestry", while virtually ignoring losses due to non-wilderness designation. For example, in the comparative analysis of impacts for alternatives, the DEIS (p. 20) states that impacts on soil and water for non-wilderness designation would be "negligible". This discounts the real impacts of erosion which would occur due to motorized travel. Water quality would also be impacted by the erosion. No attempt is made to acknowledge these impacts.

Similarly, for the resource, "wilderness", the DEIS (p. 21) notes (for non-wilderness designation) the impact as "lose some values". In a subsequent section which gives a unit by unit analysis of impacts for each alternative, very little clarification is given on what wilderness values will be lost.

Another way in which non-wilderness values are given priority may be seen by analyzing the Comparative Analysis of Impacts For Alternatives. In some instances "potential losses" and "long term losses" of resources due to "All Wilderness Designation" are stated as if they are immediate losses. For example, in Comparative Analysis for the resource "forestry" (assuming All Wilderness Designation) the impact is stated as "Lose 43,930 cords of firewood and 8,588 mbf of saw timber". It is not pointed out here that the "loss" is actually a "projected loss" based on the assumption of a 150 year rotation period for timber (120 year for Douglas fir) with maximum intensive management. The "immediate loss" of timber as noted elsewhere in the DEIS is 12,085 cords of wood and 2,527 mbfs of saw timber. Sometimes losses of resources as a result of All Wilderness Designation are double counted such as "trail bike use" being listed twice as a recreation loss (DEIS, p. 60).

## Response 6

The "Comparison of Impacts" table at the end of Chapter 2 is only intended to be a summary of impacts, which can be compared from one alternative to another. A more detailed discussion of the impacts of activities such as forestry projects is in Chapter 4 of this FEIS where the length, location, and effect on wilderness values of the project are given.

In the DEIS some projects that were proposed as livestock grazing, timber, and wildlife resource projects may be on the same acres and would have the same impacts. However, at times these impacts may have been counted twice since the exact location of projects was not known. An effort has been made in this FEIS to give locations of projects so no double counting of impacts occurs.

The example in this letter refers to a loss of annual recreation days by back-country vehicle users and hunters due to restriction on back-country vehicle use. Since recreational back-country vehicle users and hunters who use vehicles for back-country access are counted separately, this was not double counted.

The question of whether the pre-existing preference for non-wilderness values as expressed in the MFP is related to the unequal weight given to wilderness values in the DEIS seems relevant.

## IV. RECOMMENDATIONS

1. That both Lower and Upper Grape Creek be designated "wilderness" with the following adjustments:
  - a. Lower Grape Creek - The northwest boundary of Lower Grape Creek should be the ridgeline which separates Sunset City Gulch drainage and the Goat Park Drainage excluding two inholdings and the heavily impacted Sunset Gulch area.

The DEIS, in Alternative C, deleted two sections, one starting from the Tights emitting Horseshoe Mountain, extending to Marsh Gulch. This adjustment was suggested to eliminate conflict with two patented mining claims (DEIS p. 15). This deletion not only eliminates the most scenic section of Lower Grape Creek, but also creates management problems due to the conflict between motorized and non-motorized recreation.

The second boundary adjustment under Alternative C omits the land west of Goat Park Gulch "...because of the cumulative impact of past mining activity". (DEIS p. 15) This claim conflicts with the description of this area in the BLM Intensive Wilderness Inventory (p. 277) which states, "In Goat Park Gulch is an old gold mine which is well screened by topography and vegetation with the exception of one tailings pile which can be seen from about 40 yards. There is a way from Marsh Gulch to some patented land... however it is only a detraction from naturalness in Section 19, T. 19S, R. 71W... This portion of the way is well screened with piñon and juniper and is not a major impact."

On site inspection of this area by members of the Wilderness Study Group this summer indicates the major impact from Sunset Gulch to Cooper Gulch which is being recommended for exclusion.

- b. Upper Grape Creek - Recommend deletion of a small (approximately 240 acres) southeast portion of Upper Grape Creek eliminating a mineral conflict with patented mining claims in the area.

The DEIS under Alternative C suggested two boundary adjustments: First, 300 acres in the northeast corner along Grape Creek allowing, "...a more concentrated and manageable unit and exclude an area that would be difficult to manage because of backcountry vehicle use (DEIS, p. 15). On site inspection of this area indicates very minimal use by off-road vehicles up Upper Grape Creek. The heavy use area is down Bear Gulch, cross Grape Creek, and up East Pierce Gulch.

The other previously noted boundary adjustment of 240 acres eliminating mineral conflict is reasonable given the size and location of the area.

2. Equal consideration should be given to wilderness values, specifically taking into account losses from erosion impacting soil, water quality, and plant communities. Noise pollution and its impact on wildlife should be addressed.
3. Special features should be given more consideration. Specifically, pre-historic values need to be more fully documented. Educational, ecological, and scientific issues, at least, need to be noted as required by BLM guidelines.
4. Mining activity within both WSA's needs to be clarified including documenting level of activity.
5. Grazing in the units should continue, and be managed more effectively.
6. Consideration should be given to the future possibility that Upper and Lower Grape Creek and the adjoining Tanner Peak Forest Service Area could be jointly managed.
7. The rationale for recommending "non-wilderness" designation should be more clearly stated for each WSA.

Response 7

Although management had at one time considered a motorized trail along Grape Creek, it has been decided that if the Lower Grape Creek WSA is not designated wilderness, back-country vehicle use would not occur along Grape Creek. No conflict between motorized and nonmotorized recreation would occur under management currently proposed if the area is not designated wilderness.

The second boundary adjustment was made to eliminate the cumulative impact of past mining activity. The quote in this comment describing the impacts in Goat Park is taken from BLM: Intensive Wilderness Inventory, Final Wilderness Study Areas, November 1980. As stated in the foreword of the above mentioned document, "The narratives included within this report are summaries of detailed inventory reports." The actual Intensive Inventory Report describes several imprints of man in this part of the unit. Individually these are not considered major impacts. However, as directed in Wilderness Study Policy; Policies, Criteria and Guidelines for Conducting Wilderness Studies on Public Land (published in F.R./Vol 47, No. 23, February 3, 1982) Chapter II, E., human imprints were evaluated both individually and on a cumulative basis. For this part of the WSA, the cumulative impact of these imprints is considered significant enough to warrant analysis of a separate alternative.

Response 8

The partial wilderness alternative for Upper Grape Creek omitted only 600 acres. Analysis revealed no difference in impacts or values in this portion omitted that warrant further consideration. The impacts are completely covered by describing the all wilderness alternative and

## REFERENCES

- Bureau of Land Management: Intensive Wilderness Inventory, Final Wilderness Study Areas, November 1980, pp. 277-285.
- Bureau of Land Management: Management Situation Analysis, Management Framework Plan, Royal Gorge Planning Area, April 1975.
- Bureau of Land Management: Draft Environmental Impact Statement, Canon City District, Wilderness Planning Amendment, U.S. Dept. of the Interior, August 1982.
- BLM: "BLM Draft Wilderness Study Policy: Policies, Criteria, and Guidelines for Conducting Wilderness Studies on Public Lands", Federal Register, Vol. 45, No. 246, Friday, December 19, 1980 p. 3791.
- BLM: "Wilderness Study Policy: Policies, Criteria, and Guidelines for Conducting Wilderness Studies on Public Lands", Vol. 47, No. 23, February 3, 1982.
- Cocker, Robert J. "Mineral Resources of the Arkansas Canyon Planning Unit With Special Emphasis on the Grape Creek Study Area and the McIntyre Hills Wilderness Study Area", March 12, 1982.
- Grubb, Alice, "A Proposal to Establish Grape Creek WSA", University of Colorado Wilderness Study Group, July, 1982.

56-29

RESPONSE TO LETTER 56-29

RAYMOND M. VAVRINEK  
5185 Thistle Court  
Colorado Springs, Colorado 80917  
Telephone (303) 574-2570

18 NOV 1982

Jack Albright  
Project Manager  
Bureau of Land Management  
P. O. Box 1470  
Canon City, Co. 81212

Dear Sir:

I wish to state my opposition to the declaration of the Beaver Creek area as a "wilderness area".

With the passage of P.L. 96-560, the state of Colorado had over 2.3 million acres of "wilderness". There is about one acre per person. Isn't this enough?????????

Designation of the Beaver Creek area as wilderness will only remove that much more from the reach of the majority of the people. How many will be able to enjoy this spot when you close the roads and the parking areas????? How many hikers will use the area when you are forced to destroy the present hiking trails?????????

Isn't it nice that both the BLM and the conservationists are willing to keep the present air standards so that Coloradoans will not have to dismantle its power plant.

Just how long do you expect it will be after the designation before some one cues the BLM to get the air standards to meet those proscribed in NEPA Part 51????? Who will bring to court a suit to enforce the establishment of "Integral Vists".

Do you declare this land "wilderness" is contrary to the public good.

M. M. Vavrinek

there would be no significant reason to consider this partial alternative. As a result only the all wilderness and no wilderness alternative are now considered for Upper Grape Creek.

Since the suggested boundary change in this comment only omits one of the two portions recommended in the partial alternative, the impacts would still be the same as discussed in the all wilderness alternative.

Response 1

Since there are currently no roads nor parking areas in the Beaver Creek WSA, none would be closed. The existing trails in the WSA would be maintained under wilderness designation and construction of additional trails would also be possible.

Response 2

The air quality in the Beaver Creek WSA is presently designated Class II under the Federal Clean Air Act. The designation of an area as wilderness does not change the air quality standards for that area. A recommendation for wilderness designation is not a recommendation for stringent air pollution controls. If this WSA is designated wilderness by Congress, nothing would necessitate a reclassification to Class I. The BLM Wilderness Study Policy states, "The Department of the Interior will not recommend reclassification to the more strict Class I in connection with future wilderness recommendations . . . air quality reclassification is the prerogative of the states. . . ." Such a decision would be made by the state of Colorado, not BLM. Therefore, air quality standards are independent of wilderness status and are not an issue in this FEIS.



Nov. 11, 1982

Jack: Albright  
Bureau of Land Management  
Royal Gorge National Area  
P.O. Box 1470  
Canon City, Co. 81212

Dear Sir:

I agree with your recommendation that the world's largest 6,614 acres be included as a BLM wilderness area. Both it and Royal Gorge are magnificent unspoiled country.

It was a small tourist business up Chubb Creek in Chaffee Co. I know how much the beautiful primitive land means to all of us who come in there and leave refreshed, stimulated by their contact with nature.

Tourism is a big thing in our area, considerably more stable than the mining and breeding of horses introduced into some of the BLM lands. They produce a lower or best economy, without as many weather crises.

It takes an unusually long time to produce a tree under the climatical conditions that exist in Colorado - dry summers - severe winters. In twenty years I have noted how slowly they replace themselves.

Should the U.S. Government vote against such money - who doesn't? I think it is a moral responsibility we have to have the greater portion of our public land intact. I don't think we should turn our political attention to economic pressure should the tourism pollutions in public lands. There are a few strong arguments against the type of our beautiful wilderness.

There is no other way the housing accord. Sincerely, John B. Bick

RESPONSE TO LETTER 57-30

Thank you for your letter.

Nov 15, 1982

Dear Mr. Albright,

58-31

Please include this letter in the Wilderness hearing records.

I implore the BLM to do everything possible to make Beaver Creek, Upper and Lower Grape Creek, Brown Canyon, McIntire Hills, San Luis Hills and Sand Castle areas all Wilderness Areas.

The Pike's Peak region is expanding at a fantastic rate and needs close-by places for its inhabitants to get away from cities and roads and enjoy the wild beauty of Colorado. I feel the above mentioned areas are ideal for this purpose.

America's wilderness lands are far more valuable to us now and to people of the future if they are kept wild and not exploited for their limited mining, logging, or other commercial resources. I oppose any oil, gas, or mineral development in any Wilderness Area or W.S.P.

Sincerely,

Chris Null  
1225 N. Custer Ave  
Colo. Springs, CO  
80903

RESPONSE TO LETTER 58-31

Thank you for your letter.

November 10, 1982

Mr. Jack Albright  
Project Manager  
BLM Royal Gorge Resource Area  
P. O. Box 1470  
Canyon City, Co. 81218

RESPONSE TO LETTER 59-34

Thank you for your letter.

Dear Mr. Albright,

Please make this letter a part of the hearing record.

I support your plan to recommend wilderness protection for the Beaver Creek and Brown's Canyon areas. They are both rugged areas that offer solitude and natural beauty. However, I feel that Alternative C would be more preferable than A in protecting the Beaver Creek area. This area is very close to a large population center and wilderness recreation is in very high demand. By keeping the 4,000 acres south of the McRobert drainage wild, we will be utilizing our resources best effectively.

Sincerely,

*John Wallace*

John Wallace  
6985 Delmonico Blvd.  
Colorado Springs, Colo. 80919

60-35

November 16, 1982

Mr. Jack Albright  
Project Manager  
BLM Royal Gorge Resource Area  
P. O. Box 1470  
Canyon City, Co. 81212

RESPONSE TO LETTER 60-35

Thank you for your letter.

Dear Mr. Albright,

Please make this letter a part of the hearing record.

I disagree with BLM's decision to recommend non-wilderness status for the Upper and Lower Grape Creek areas. I feel that the wilderness benefits of these areas far outweigh any less protective designation.

The steep walls and numerous side canyons of Grape Creek affords many opportunities for solitude. The sheer rock faces and the variety of vegetation make this area a suitable candidate for our Wilderness System.

Sincerely,

*John Wallace*

John Wallace  
6985 Delmonico Blvd.  
Colorado Springs, Co. 80919

Jack Albright, Project Manager  
Bureau of Land Management  
Royal Gorge Resource Area  
P.O. Box 1470  
Canyon City, CO 81212

RESPONSE TO LETTER 61-37

Thank you for your letter.

Dear Mr. Albright:

I am writing you in reference to your Area's wilderness recommendations. I commend your viewpoint of the fine wilderness characteristics of Beaver Creek and Brown's Canyon. I would like to express my support for the Beaver Creek Alternative C and my opposition to Alternative D. The 4000 acres South of Hellert Meadows are an integral part of the larger Beaver Creek ecosystem. Backpacking, wildlife and other wilderness values outweigh timber values to be gained from this area. I definitely support your recommendation for the full release of Brown's Canyon. The terrain is too rugged to make timber and minerals production economical. I was also pleased to see your wilderness recommendation for the Sand Cattle area.

However, I oppose the BLM's non-wilderness recommendations for Upper and Lower Grape Creek. The RMA's emphasizes timber, grazing, minerals and

2 stark growth

61-37

CRV potential to the detriment of natural attributes such as riparian habitat and species diversity. The Cooper Minerals study concludes that the area has "little economic potential", yet minerals potential is cited as a basis for wilderness exclusion. I would like to recommend the inclusion of both areas, with the exception of the Sunset Gulch section of Lower Grape Creek and the small SE section of Upper Grape Creek containing suballuvial.

I also oppose the non-wilderness recommendations for the Sawtooth Hills. This is one of only two Colorado units representing the "fascine mountain meadow prairie" vegetation class and therefore provides a new addition to the National Wilderness Preservation System. Minerals similar to the ones in this area are found in surrounding areas. The unique geologic and plant values of this unit are irreplaceable as a part of our earth heritage and should be preserved for both this and future generations' enjoyment. I recommend inclusion of this unit minus the heavily mineralized NE section deleted in Alternatives C and D.

Because the range, timber and CRV uses of the McCutcheon Hills have greater value than the wilderness values, I agree with the BLM's non-wilderness recommendation for this area.

I request that this letter be made a part of the hearing record.

Sincerely,  
Thomas Stark

November 21, 1982  
4860 Sima Drive  
Boulder, CO 80303

Jack Albright, Project Manager  
Bureau of Land Management  
Royal Gorge Resource Area  
P.O. Box 1470  
Canon City, CO 81212

RESPONSE TO LETTER 62-38

Thank you for your letter.

Dear Sir:

Please include the following statement in the public hearing record of October 12-14,

Wilderness Preservation is absolutely necessary for the continued well-being of our country. I believe maximization of protected area is more desirable than deletion of acreage with possible mineral resources, we should not sacrifice wildlands on the pretense of reserving the area for mining of a potentially valuable mineral. Indeed, the value of minerals seems often to be over-emphasized and the value of wilderness overlooked, especially under the Reagan administration. Resource conservation, consumer restraint, and population control are necessary policies for the very near future.

Please do not open up so many natural areas for exploitation. Please make wilderness of Upper and Lower Gorge Creek areas and especially the San Luis Hills area.

Sincerely,  
Andrew H. Conway

63-39



Chevron USA Inc.  
700 South Colorado Blvd., P.O. Box 589, Denver, CO 80201

Richard T. Hughes  
Staff Analyst  
Legislative and Regulatory Affairs

November 23, 1982

WTP - Wilderness Amendment  
Royal Gorge Resource Area

RESPONSE TO LETTER 63-39

#### Response 1

A mineral and oil and gas survey of the Beaver Creek WSA was done by BLM, U.S. Geological Survey, and Bureau of Mines personnel. This resulted in a determination that there is zero potential for oil and gas resources because the area is underlain almost entirely by Precambrian igneous and metamorphic rock. There are no oil nor gas leases in or near the WSA. In addition no data has been submitted since publication of the DEIS, which indicates that there is potential for oil and gas in the Beaver Creek WSA.

Mr. Jack Albright  
Bureau of Land Management  
P.O. Box 1470  
Canon City, Colorado 81212

Dear Mr. Albright:

By letter of June 29, 1981, we commented in the issue identification stage of the captioned plan and expressed our concern that lands with energy and mineral potential be managed with minimum restriction on exploration and development. In that letter, we specifically noted the potential of the Lower Gorge Creek and Beaver Creek WSAs.

At this date, we are concerned with your preliminary recommendation that 17,000 acres of the Beaver Creek WSA be designated as wilderness. Seismic information in this area indicates significant potential for production of oil and gas. We fear that your wilderness recommendation will inhibit industry's ability to make a more detailed examination and determine what resources exist. We encourage you to reconsider this preliminary recommendation.

Very truly yours,

Richard T. Hughes

RTH/cgf



November 22, 1982

RESPONSE TO LETTER 64-40

Mr. Jack Albright, Project Manager  
Bureau of Land Management  
Royal Gorge Resource Area  
P.O. Box 1470  
Canon City, CO 81212

Re: Canon City District Wilderness Plan Amendment/  
Environmental Impact Statement - Colorado

Dear Mr. Albright:

Atlantic Richfield Company appreciates the opportunity to comment on the Bureau of Land Management's Draft Environmental Impact Statement and the Canon City District Wilderness Plan Amendment.

We support BLM's recommendations of nonwilderness for the McIntyre Hills, Lower/Upper Grape Creek, and San Luis Hills Wilderness Study Areas due to the fact that these areas harbor mineral potential. We have no conflicts with the wilderness recommendations of Beaver Creek and Sand Castle WSA's due to their lack of mineral potential. With regard to Brown's Canyon, this area has some potential for hard rock minerals, and while we have no immediate interest in this WSA, it is possible that the economic situation could change in the future in which case it would be better to have the area remain in a multiple use classification.

We endorse the concept of a thorough analysis of the resource values existing on Wilderness Study Areas in order to determine what the priorities are. Obviously, tradeoffs are necessary when there are conflicting resource values. Tradeoffs considered would include opportunities and restrictions for access to minerals and the relative value of each conflicting resource before recommendations are made for wilderness designation. Energy and mineral resources must play a major role in wilderness decisions. It is essential that the exploration for and development of these resources be provided for by opening or maintaining access to areas which may contain these values. Areas identified as having mineral resource potential, such as the above

Response 1

Mineral resource investigations of the Browns Canyon WSA by BLM, U.S. Geological Survey, and Bureau of Mines personnel resulted in a low potential determination for this area. This determination was based on an extensive literature review, field investigations, site sampling, and reconnaissance geochemical evaluation, which in all cases identified low resource potential for minerals. The one exception to this determination is a perlite deposit situated on the extreme north end of the WSA. This resource has a measured reserve of 540,000 short tons and an inferred reserve of 2.5 million short tons of which 30 percent is situated within the WSA. This deposit, although potentially viable, is small in comparison to producing perlite mines. The currently producing Rosita, Colorado, perlite deposit has a reserve of 20 million tons in 1956. No known interest in development of this perlite resource from the WSA has been expressed.

64-40

Mr. Jack Albright  
November 22, 1982  
page 2

mentioned WSA's contained in the Canon City District Plan Amendment, should remain open to mineral activities.

In conclusion, we support the Bureau's nonwilderness recommendations as outlined in the Draft EIS. Given the mineral potential existing in these WSA's, it is important that the BLM keep its preliminary recommendations in tact when making the final recommendations on these areas.

Sincerely,

*J. R. Mitchell*  
J. R. Mitchell

CMW:dcm

November 22, 1982

Suzanne H. Kaempfer  
997 B. Roxwood Lane  
Boulder, CO 80303

Jack Albright, Project Manager  
Bureau of Land Management  
Royal Gorge Resource Area  
P.O. Box 1470  
Canyon City, CO 81212

RESPONSE TO LETTER 65-41

Thank you for your letter.

Dear Mr. Albright:

Please add the following comments to the hearing record for the Canyon City BLM Wilderness recommendations:

- 1) Beaver Creek- I support Alternative C, but oppose preferred Alternative D.
- 2) Brown's Canyon- I support wilderness designation for this area, especially since the terrain is too rugged to make resource exploitation worthwhile.
- 3) Sand Castle- I support wilderness designation for this area as it will round out Great Sand Dunes N.M.
- 4) Upper and Lower Grape Creek- I oppose BLM's non-wilderness recommendation since in the DEIS wilderness benefits were ignored in favor of resource development with poor economic potential.
- 5) San Luis Hills- I favor wilderness designation for this area minus the heavily mineralized NE section deleted in Alternatives C and D.
- 6) McIntyre Hills- I concur with non-wilderness designation for this area.

Thank you for allowing me to express my views.

Sincerely,

*Suzanne H. Kaempfer*  
Suzanne H. Kaempfer

66-42

over on 12, 1982

RESPONSE TO LETTER 66-42

Jack Albright  
Bureau of Land Management  
Canyon City, Colorado  
Dear Mr. Albright:

Thank you for sending us your informative Wilderness Inventory of the Grand Wilderness Study areas which arrived over the end.

I have read and am in this report, especially the Canyon City District which is important to me as I visit this area seasonally on an amateur to the quality of my surroundings, the own a point in time on these have moved and have up these and once a week, when in up to the north, I do a lot of hiking there and elsewhere and enjoy the living mountains.

With the rapid population expansion and marked increase in recreational use of our mountains, now is the time to look to the future and protect it with as much of these beautiful and not fertile regions, especially the eastern ranges, closed to the large population centers, as we need as wilderness.

These recreational areas have increased here in these years so slowly, these parts of this country are much better suited for more recreation. Canyon City is a natural beauty accelerates expansion, taking a little bit, opens up new areas which are then followed by the a and all manner of destruction because, as in nature, as my personal husband feels that the natural potential is very limited.

Lower, upper creek and the entire life of the area and all of the rest of the world should be included in the Wilderness System. These areas are a great and great which, seem to be up to the future, in the future and all manner of from these areas so a few have moved this time to, especially as initiative of wilderness areas is necessary. The old and about more and more areas in the area and the area is defined from the area.

The population has increased in the area and all of the areas are up to the future, in the future and all manner of from these areas so a few have moved this time to, especially as initiative of wilderness areas is necessary. The old and about more and more areas in the area and the area is defined from the area.

Upper, lower creek and the entire life of the area and all of the rest of the world should be included in the Wilderness System.



It is wonderfully seen from Canyon Park which I've climbed various times and also Mt. Pecos (1951) on the opposite side.

Now's Canyon I only know from an exciting raft trip there in 1971 and the unique canyon deserves not only a name but also a wilderness.

The foot-steady lower Chaco area is closer to population pressures than most so is needed in wilderness especially. I haven't lived in there for some time and recall it favorably and I know it is potential for recreation. Leaving the Chaco Canyon road and the view from Angles Inn, give some impressions of this section and I would like to see the whole with as wilderness.

The other USH's one less-known to me, but the small bits near the Sand Dunes and north of there could be easily allowed in as wilderness. I should think the San Luis Valley, both north and south of Route 160, are neither relevant but I drove the road and then, increasing way and July, 1982 and I like this area, unspoiled nation. This would seem to be the time to protect these areas, as well as other areas including the Rio Grande gorge and even better, the mountains.

Perhaps there would be not suitable but I vote for as much wilderness as is practical. There is too much "resource development" now and it has damaged too much of our country.

hoping to hear of your decision to support wilderness, I am,

Sincerely,  
 Truman C. Carter  
 (as usual, Carter)

Please include this letter in your hearing record.

F. Martin Brown  
 6715 South Markshoff Road  
 Colorado Springs, CO 80911

67-43

23 November 1982

RESPONSE TO LETTER 67-43

Thank you for your letter.

Mr Jack Albright  
 Bureau of Land Management  
 10714 George Washington  
 P.O. Box 1470  
 Denver, CO 80212

Dear Mr Albright:

As Lavin of the State Environmental group has asked me to write to you about my knowledge of the "Sand Castle" (CO-050-b35) proposed area. I have wandered over the area west of the Great Sand Dunes National Monument for some years. In fact my first visit to the area in general was in pre-1960s days when a rodeo with a jack-animal from the Irindore ranch house to the dunes and camped near the present site of the picnic grove of headquarters.

For 5-6 years I have been building an insect collection for the monument and acting as a source of natural history information to the park people. I know the three small blocks of land in Alamosa County quite intimately, the little one in Saguache I've visited but once, far more important than any of these is the two next one (or two half-sections) north the dunes of the Indian Spring. It is imperative that that spring be preserved. At present cattle are fouling it and it is rapidly deteriorating. It has changed in the years I've known it.

All of the region is interesting to a naturalist as a very tender ecological niche where the grasses, primarily Indian dunes grasses, are battling the sand and wind. In a few spots the grasses are holding their own, in other the wind and sand is winning. A long-term study of this battle should be made. The utilization of these dunes and sandflats is ill-known. Some rather rare animals, mostly insects, inhabit the area. None of these is either endangered or threatened so long as the sand dunes still remain. However, I have seen a goodly block of the dunes country deleted from the monument through Congressional action and given to the state to be leased to ranchers. That is how we lost the Indian Spring.

I suppose the beetle *Chindolea theutoni* which could be used as a hook on which to hang a plea to preserve the areas noted. Especially the latter one in sections 2 and 3, the others are too small to support biologically breeding populations of almost anything. The butterfly, *Teronymia madi* almost dead a small one on the endangered list but since removed is found in the area. Currently a track runs through the area that is used by anyone visiting the Indian Spring from the east. It seems to do no real harm since the winds fill it with sand.

5-62

As much as I like to see land protected from exploitation, I can see no good reason for setting aside such small areas. If these sites are planted by ash, I hope that they will be put under the control of the BLM and that the dunes will be managed. All my conversations with existing dunes are of the same nature and I am perfectly satisfied in all natural features with land in the BLM-195. It is quite possible that there are some ecological reasons in the light of the above dunes in dunes country. I have guided a field party in on a recent so turned up several rods or dunes within the sections involved with the dunes. It seems to me that these over-maintenance arrangements for plants are not severe, but merely directly at it. The spring of the dunes should be section 2 to make them a place worth fine-considering.

There also seems interesting connections between the dunes in dunes. These may be due to a fine or nearby grounds in water dunes. There are lots of reasons for protecting the dunes, and as they are, but none seem to me to be either unique or spectacular.

Anytime that you are planning through, drop in and we can talk about areas that need protection.

Sincerely

F. Martin Berry

68-44

WE, THE UNDERSIGNED RESIDENTS OF FREMONT COUNTY, URGES THE FREMONT COUNTY COMMISSIONERS TO SUPPORT WILDERNESS DESIGNATION FOR THE BUREAU OF LAND MANAGEMENT (BLM) AREA NORTHEAST OF CANON CITY -- KNOWN AS "BEAVER CREEK".

1981-82

name	town	address
Kathryn Deane	Canon City	308 W. Dean
Carol Deane	Canon City	105 E. Hankley
Brian Peterson	Canon City	316 E. 10th St.
Wilbert H. Mery	Canon City	922 College
Robert C. Lewis	Canon City	1216 Park Ave.
Neil J. Mery	Canon City	922 College Ave.
<del>John J. Mery</del>	<del>Canon City</del>	<del>922 College Ave.</del>
Jane M. Gorman	Canon City	820 W. Main Ave.
John B. McFarlane	Canon City, Colo.	1340 College Ave.
Harold L. Gorman	Canon City	812 9th Ave.
Steve Dunn	Canon City	1310 Rudd
James R. Horton	Canon City	Box 56
Anna Kelly	Canon City	Box 242
Richard Hansen	Canon City	Box 1184
Lynda Kelly	Canon City	1313 N. 5th
Robert D. White	Canon City	Blue Point
Exel J. Kelly	Canon City	80 Box 107
Bob Hamley	Canon City	1408 Addison
John Hamley	Canon City	1421 S. 7th
Donna Murphy	Canon City	241 Glenmoor Rd.
James Adams	Canon City	1406 S. 9th
John Ryan	Canon City	556 Deanne
Emily Tracy	Canon City	612 N. 11th St.
Michael Adams	Canon City	3065 E. Hwy 50, Apt. B2
Michael Adams	Canon City	3065 E. Hwy 50, Apt. B2

RESPONSE TO LETTER 68-44

Thank you for your letter.

WE, THE UNDERSIGNED RESIDENTS OF FREMONT COUNTY, URGES THE FREMONT COUNTY COMMISSIONERS TO SUPPORT WILDERNESS DESIGNATION FOR THE BUREAU OF LAND MANAGEMENT (BLM) AREA NORTHEAST OF CANYON CITY -- KNOWN AS "BEAVER CREEK".

name	town	address
K. L. Watson	Canyon City	1115 Marshall
Jim Bane	Florence	417 E. 3rd
Robert M. Packard	Florence	1151 W. 3rd
Lo. Laper	Florence	1115 Marshall
Steve Morris	Florence	1327 W. 4th
Ernie Morris	Florence	1327 W. 4th
Roger Morris	Canyon City	1103 Marshall
Bonnie DeFoe	Canyon City	1401 Lombard
Marjorie Worthing	Canyon City	201 Sherman Ave
John A. Kessler	Canyon City, Co	1426 S. 9th St
Alvin (Nephew)	Canyon City	1801 S. 9th St
and others	Canyon City	1103 Marshall
Edith Minchog	Canyon City	P.O. BOX 741
Harold (Nephew)	Canyon City	1433 Humboldt
and others	Canyon City	Box 742 (Nephew)
and others	Canyon City	Box 742

NOV 26, 1982 69-45

Mr. Allright,

As one who has visited and enjoyed the Beaver Creek Wilderness Study Area I strongly urge its protection. It's obvious from the throngs in Phantom Canyon on a summer weekend how popular this place is. Study and personal experience show Beaver Creek to be a rich wildlife habitat, a very clean watershed and undeniably beautiful.

I favor Alternative C in the DWS. Please include this letter in the Hearing Record on Beaver Creek.

Thank you,  
 David Lucas  
 DAVID LUCAS  
 865 1 GRIFF  
 BOULDER, CO 80302

RESPONSE TO LETTER 69-45

Thank you for your letter.

WE, THE UNDERSIGNED RESIDENTS OF FREMONT COUNTY, URGES THE FREMONT COUNTY COMMISSIONERS TO SUPPORT WILDERNESS DESIGNATION FOR THE BUREAU OF LAND MANAGEMENT (BLM) AREA SOUTHEAST OF CANYON CITY -- KNOWN AS "BEAVER CREEK".

[illegible]

2000

WE, THE UNDERSIGNED RESIDENTS OF FURNIGHT COUNTY, UNDER THE FURNIGHT COUNTY COMMISSIONERS TO SUPPORT WILDERNESS RESTORATION FOR THE BUREAU OF LAND MANAGEMENT (BLM) AREA NORTHEAST OF CATCH CITY - KNOWN AS "BEAVER CREEK".

name	town	address
Kay Strucklen	Cannon City	890 Inlet Box 1224
Ed A. Thrall	Cannon City	E30 Road Box 122 E
Bruce Johnson	Cannon City	DW Road Cannon City
Ronald Hansen	Box 1109 Cannon City	
William Brown	Cannon City	Box 1104 near st 120
Robert Crane	Cannon City	Box 1104
Larry H. Fisher	Cannon City	89 Plum
Rob. Palmer	Cannon City	2747 Cherry St.
Paul D. Kendall	Cannon City	422 Harrison Av.
Art Hansen	Cannon City	423 N.E.
Guthrie Riedel	Cannon City	649 Franklin Ave.
Sandra Gray	Cannon City	
Arden Kistner	Cannon City	
To Debra	Cannon City	312 S. 1st St.
Gregory Berggren	Cannon City	#3 Maple
Edward W. Cannon	Cannon City	1355 Mount St.
Marjorie Berggren	Cannon City	125 Hillside Dr.
John L. Church	Cannon City	773 Riverside
Carl McQuinn	Cannon City	2744 Cherry St.
James Manning	Cannon City	1504 W. 3rd St.
James J. Hill	Cannon City	515 Sleightway
William Lee Smith	Cannon City	1721 Spruce
William Stuart	Cannon City	1451 S. 6th St.
Donna Murphy	Cannon City	241 Glenwood
Steve & wife	Cannon City	1589 Poplar Ave.

22 November 1982

Jack Albright, Project Manager  
Bureau of Land Management  
Royal Gorge Resource Area  
P.O. Box 1470  
Canon City, Colo. 81212

RESPONSE TO LETTER 70-46

Thank you for your letter.

Comments on the Draft Wilderness Environmental Impact Statement, alternatives for designation of the wilderness study areas within the Royal Gorge, Saguache, and San Luis planning units of the Canon City District, Colorado:

Like many others, I moved to Colorado lured by visions of the state's outdoor beauty and wilderness opportunities. I left a state where urbanization has eaten up wild areas for hundreds of miles around the large cities, making easy escape to restful and renewing natural areas virtually impossible.

Since moving here I have enjoyed Colorado's open space even more than I imagined. Hiking and cross-country skiing in these areas has shown me the quiet beauty, peacefulness and power of wilderness to restore perspective on workday and urban problems. I have met many people in Colorado who feel as I do and have developed a commitment to preservation of the wilderness values that we share.

Over the years I have witnessed mining, timbercutting, and other development interests gradually devour huge chunks of our remaining wilderness heritage. Once developed, these lands can never be restored to their fragile and primitive beauty. No other contemporary issue concerns me more than this deterioration of our wildlands. Nothing less than the quality of our lives is at stake, and I believe that preservation of this quality is worth fighting for.

2

70-46

I have read the Draft Environmental Impact Statement for the wilderness study areas of the Canon City District and have attended hearings on these same lands. I would like to express the thoughts I have developed while considering the alternative proposals for these areas. Regarding specific units:

Brown's Canyon (no. 002) is largely untouched by mining and other development. It offers outdoor challenges at all levels and is home to many wild plant and animal species. Mineral and grazing potential appear insignificant in contrast to recreational and wilderness potential, especially in view of the area's easy accessibility for front range urbanites. I support the Bureau's recommendation of permanent wilderness designation for Brown's Canyon.

Upper and Lower Grape Creek (nos. 017 and 018) together present just the combination of scenery, ecosystems, geologic formations, historical features, and opportunities for solitude that we should be making every effort to preserve. And these features are consolidated in an area that is easily reached by urban Coloradans. Mineral resources seem insignificant, grazing has not yet spoiled the area's undeveloped appearance, and relics from mining and railroad days are unobtrusive.

Water resources are too scarce to be of value; grazing and timber-cutting potential is limited to short-term gains that are heavily outweighed by the irreversible loss that development of Grape Creek would cause. Management problems posed by inholdings could be solved by excluding these areas from the larger wilderness designation, but the entire unit must not be downgraded because of these small exceptions.

The information I have seen (including the Draft EIS) indicates that Grape Creek does qualify for permanent wilderness designation under the criteria the Bureau has

applied to other study areas. I strongly urge that both Upper and Lower Gorge Creek be given wilderness status. While a few boundary adjustments may be necessary, the area should be preserved in its natural state as nearly as possible.

Proposed wilderness designation for the Beaver Creek area (no. 016) has raised many arguments both in support and in opposition. The most objectionable of the latter is the claim that wilderness designation for this parcel would force Colorado Springs to adhere to higher air quality standards. This is untrue, as is the claim that Colorado Springs' economic base would somehow be damaged. I encourage the Bureau of Land Management and Congress to examine the vested interests of those who advance these arguments and to consider what their motivations might be. I believe they reflect narrow, short-sighted, and poorly informed opinions of developers who would obtain short-term economic gains from Colorado, leaving little for the future. They do not speak for the majority of Coloradans who enjoy outdoor recreation and fresh air and who want these resources preserved for the future.

I submit that Colorado's wilderness is itself a valuable economic resource, one which we must conserve for unlimited and ever-renewable use by recreation, tourist, and other non-destructive interests.

We need our wilderness for the present and for the future. Any area developed now will be irretrievably lost to the future. Wilderness cannot be taken apart and put back together without the loss of that ephemeral beauty and tranquility that made them special in the first place. Studies (and common sense) show that wildlife is most benefited by land in its natural state -- the conditions under which the animal and plant life evolved, not by an ecosystem that has been mowed, grazed, timbered or otherwise developed, and is then "restored" (at great

taxpayer expense)

Mineral resources in the Beaver Creek area are considered insignificant. Water is too scarce for development. Livestock grazing potential is marginal. On the other hand, a great variety of wild species makes homes in the rugged and diverse terrain around Beaver Creek. Coloradans at other areas left few traces on the land in this area and it provides an excellent escape from human and urban landscapes. For all of these reasons, Beaver Creek should be a prime candidate for permanent wilderness designation. Of the alternatives put forward by the Bureau of Land Management, Alternative C appears to be a reasonable plan -- one which I support.

The picture of San Juan Hills (no. 141) presented in the Draft EIS is less than enticing. Yet the unit has excellent hiking and backpacking potential and in most respects still offers an escape from traces of human habitation. The presence of significant mineral resources is doubtful; exploitation of those questionable resources will require trading a known scenic and recreational asset for an unknown, perhaps marginal, certainly short-term economic benefit. After development, both esthetic and economic values will be lost to future generations. As in other study areas, water and grazing resources are slight. In light of these considerations I support permanent wilderness designation for the San Juan Hills area.

Concerning two other areas, MacIntyre Hills (no. 015) and Sand Castle (no. 701), I am in general agreement with the Bureau's preferred alternatives. Several considerations detract from the wilderness potential of MacIntyre Hills. The Sand Castle region is an obvious candidate for wilderness status since its acreage is contiguous with National Park Service lands.

As urbanization along Colorado's Front Range continues, and as existing cities grow, Coloradans new and old will seek the well-advertised benefits of wildland recreation in ever-



larger throngs. We are learning how wilderness can renew our relationships and our abilities to cope with urban stress; how it can restore our confidence and our enthusiasm for life; how it can teach us to appreciate beauty and to create it in our own lives. Wilderness can make all of our lives better in many, many ways, but only if we make the effort to provide for its preservation before it slips away.

Mary Ann Robinson

918 N. Custer Ave.  
Colorado Springs, CO 80903  
(303) 475-0645

71-48

Denver, Colorado  
Nov. 28, 1982

Dear Mr. Albright,

I am writing to express my opinion on the Canon City Wilderness proposals. I ask that my comments be made part of the official hearing record.

First of all, I commend the Bureau of Land Management for a well written environmental impact statement. It is easy to read and understand to the average person. The charts in Chapter 4 were particularly helpful.

I do not, however, agree with the BLM's recommendations. Only 25,258 acres are recommended for wilderness designation out of a possible 57,610 acres. Colorado needs more wilderness now. The demand for solitude, primitive recreation and the chance to visit a totally natural environment continues to rise rapidly as more and more people seek temporary relief from the pressures of big city life. Also, many people come from outside of Colorado each year to visit our pristine areas. In doing so, they spend millions of dollars, thus providing a big boost to the state's economy in a safe, clean and environmentally sound manner. Once the present crop of BLM and Forest Service wilderness study and further planning areas are dealt with, there will be no further opportunity to designate any more wilderness in Colorado, in spite of the increasing demand. We therefore need to act now to preserve the state's few remaining primitive roadless areas.

Specifically, I agree with the BLM's recommendations for Sand Castle and Brown's Canyon. These two WSAs are excellent wilderness candidates since they have few incompatible uses or potential conflicts. I believe Alternative C is better for Beaver Creek, since there is no need to eliminate the 4,000 acres south of Holbert Drainage. The potential conflicts have already

RESPONSE TO LETTER 71-48

Thank you for your letter.

been eliminated by removing 5,400 acres near the USA boundary from wilderness consideration.

I believe that Alternatives C are more appropriate for both Upper and Lower Grape Creek. Both areas have high wilderness characteristics and low mineral potential. The intensive forest management planned for both units is better suited for McIntyre Hills. Designating Upper Grape Creek "would add to the geographic distribution of wilderness areas in the Region". (p. 71)

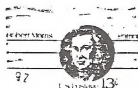
McIntyre Hills is perhaps best suited for timber management to provide fuelwood for residents of the surrounding area. San Luis Mills, with its high motor vehicle use, is similarly best suited to be non-wilderness.

But I do feel that we need more wilderness. Thus I ask the BLM to revise the recommendations to include most of Upper and Lower Grape Creek and an additional 3,750 acres in Beaver Creek in wilderness.

Thank you for your consideration,

Sincerely,  
*Rocky Smith*  
Rocky Smith  
1030 Pearl St.  
Denver, Colo 80203

Mrs. Dorothy V. Gummer  
3429 Leeds Lane  
Colorado Springs, CO 80907



RESPONSE TO LETTER 72-49

Mr. Jack Albright, Project Mgr.  
Bureau of Land Management  
Royal Gorge Resource Area  
P.O. Box 1470  
Canyon City, Colo. 81212

72-49

Thank you for your letter.

© USFS 1981

11-23-82  
I support wilderness designation for: 1.) Brown's Canyon, 6,614 acres. Its ruggedness rules out development as economically unfeasible. 2.) Sand Castle, 1,614 acres, since it borders on the Great Sand Dunes Nat'l Monument. 3.) Beaver Creek, 25,900 acres. This would provide more logical boundaries to protect geological formations and a more complete ecosystem. 4.) San Luis Mills, 7,440 acres. 5.) Upper and Lower Grape Creek, 20,000 acres. This is raptor habitat, and home for mountain lions and bears. According to the Joker mineral study, the area has insignificant economic potential.

Economic development of these areas deprives about 95% of the public of the use of their primary characteristic--wilderness--which in itself has multiple uses: watershed, rare ecosystems, hunting, wildlife habitat. These wilderness ecosystems are represented scarcely, if at all, in the NHPs, and the last of their type that can yet be preserved in Colorado.

Mrs. Dorothy V. Gummer  
3429 Leeds Lane  
Colorado Springs, CO 80907

*Dorothy Gummer*

Ideal Plaza - 850 17th Street  
P.O. Box 5785  
Denver, Colorado 80221  
303 573 9561

CERTIFIED MAIL 0211102354

November 30, 1982

IDEAL

Jack Albright, Project Manager  
Bureau of Land Management  
Royal Gorge Resource Area  
P. O. Box 1470  
Canon City, CO 81212

Re: Proposed Beaver Creek Wilderness Area

Dear Mr. Albright,

Enclosed for your review, please find our comment paper on the draft environmental impact statement for the Canon City District Wilderness Planning Amendment published by your agency.

We appreciate the opportunity to comment on the proposed wilderness designation impacts. Our concerns are relative to the Beaver Creek Wilderness Study Area and we request your further consideration of air/noise-related issues during the review.

Sincerely,

IDEAL BASIC INDUSTRIES  
CEMENT DIVISION  
Harlan W. Pawledge  
Director, Environmental Quality

MD/mm

Enclosure

IDEAL BASIC INDUSTRIES, CEMENT DIVISION  
COMMENT ON PROPOSED BEAVER CREEK WILDERNESS AREA

73-50

## RESPONSE TO LETTER 73-50

Response 1

The Cement Division of Ideal Basic Industries has made a review of the Draft Environmental Impact Statement (DEIS) for the Canon City District Management Framework Plan Wilderness Amendment and wishes to provide comment in opposition to any wilderness designation of the Beaver Creek study area (WSA D16). Ideal has no property within nor contiguous to WSA D16, however there exists a potential for a wilderness designation to adversely impact current operations and possible future expansion at our cement manufacturing facility at Portland in Fremont County.

The air quality in the entire Beaver Creek WSA is presently designated Class II under the Federal Clean Air Act. The designation of an area as wilderness does not change the air quality standards for that area. A recommendation for wilderness designation is not a recommendation for stringent air pollution controls.

Although, as pointed out in the DEIS that air quality reclassification is the prerogative of the state, designation of a wilderness area under the Federal Land Policy and Management Act (FLPMA) increases the potential for that areas assignment to a Class I air quality region as provided for in the Prevention of Significant Deterioration (PSD) requirements of the Clean Air Act (CAA). The Class I criteria are designed to protect pristine areas of the country such as national parks and wilderness areas. Hence both acts (FLPMA & CAA) respond to the administrative requirements of the Wilderness Act for establishing a management principal of nondegradation of the environment in wilderness areas, of which air is an integral part. Therefore, in addressing the potential impacts of wilderness designation, the air quality ramifications should be more thoroughly addressed in the review.

If this WSA is designated wilderness by Congress, nothing would necessitate a reclassification to Class I. The BLM Wilderness Study Policy states, "The Department of the Interior will not recommend reclassification to the more strict Class I in connection with future wilderness recommendations . . . air quality reclassification is the prerogative of the states. . . ." Such a decision would be made by the state of Colorado, not BLM. Therefore, air quality standards and the potential for redesignation is independent of wilderness status.

Page 2

The DEIS failed to provide any information about air quality of the southern portion of the WSA nor any preliminary comment as to the state's anticipated position on the redesignation issue. The DEIS did note that 'evidences of man outside the WSA (primarily to the south) can be seen' from the area, but more specifically, the Arkansas River Valley with haze lingering above Florence and Canon City (where the secondary particulate standard is currently being violated), cold weather vapor plumes from our operations and the sites of other industries are visible from the area. Not only can industry be seen, but persistent blasting noise from quarrying activity in the vicinity of Table Mountain is clearly audible from proposed wilderness areas within WSA D16.

An evaluation of these aspects would reveal existing conflicts with the spirit of solitude associated with a true wilderness experience. However, it was established in the DEIS that present recreational use patterns in the WSA are anticipated not to differ significantly under the non-wilderness alternative. The paramount mining threat to landscapes, which wilderness designation pursuit is often in protective response to, is essentially nonexistent with 'no known significant resources' in the WSA. Ideal feels these facts are indicative of the inappropriateness of any wilderness designation of this property. We therefore contend that Alternative B, with the

Page 3

majority of the area managed under primitive Recreation Opportunity Spectrum criteria, is the most suitable management program for WSA D16. Under this alternative, without losing any real preservative maintenance, air and noise issues and their economic impact on industries surrounding the area, would remain prudently independent of the optimum land use management of this particular area.

DeMouth/nm

3171A

November 12, 1982

Response 1

Mr. Jack Albright, Project Manager  
Bureau of Land Management  
Royal George Resource Area  
P.O. Box 1070  
Canon City, Colorado 81212

Dear Mr. Albright:

On Thursday, November 11, the Colorado Springs "Gazette Telegraph" published an article entitled "Official Fear Cleanup Costs at Power Plant". The point being raised had to do with the necessity of Class I versus Class II air quality designations.

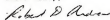
The article aroused my interest and I obtained a copy of the draft RIA from the PRACC office. I would see no mention of any atmospheric dispersion modeling to address to what extent the R.D. Nixen plant expansion would affect air quality.

Our engineering firm has performed some analyses for the Texas Air Control Board, and we discussed dispersion and visibility modeling with the BLM Cheyenne office for the Powder River basin. In this a service your office would need?

Secondly, the control technology of wet scrubbing is certainly not the only alternate. Fluidized bed burning with limestone could provide dry scrubbing. Alternately, a physically beneficiated coal supply could be much lower in ash and sulfur. We are currently discussing the economics and technology of such beneficiation with a major Colorado coal producer who is curious as to the extent of the market for coal essentially free of ash, sulfur and moisture.

We would appreciate any direction you could offer us in pursuing our services. If you need a reference on the quality of our company, Mr. Ralph Harker, Chief, Division of Scientific Systems Development of BLM in Denver will be glad to talk with you.

Yours truly,



Robert D. Andrew  
Senior Project Engineer

RDA/eng

Nov. 23, 1982

75-53

Jack Albright, Project Manager  
BLM  
Royal George Resource Area

RESPONSE TO LETTER 75-53

Thank you for your letter.

Dear Sir,

I wish to express my opinion on the Beaver Creek, Buffalo Peak, Greenhorn Mtns, and Sangre de Cristo, and Spanish Peak WSAs.

I have personally enjoyed each of these areas in numerous backpacking and a century ski-trips throughout Colorado. These trips are an important part of my lifestyle. I value wilderness as a precious resource for recreation, and as an irreplaceable laboratory for genetic variability — or natural evolution.

I have found the Spanish Peaks area to have quite "unique" wilderness value. I believe the Wilderness Value of the Spanish Peaks is unequalled that the Wilderness value of the Sangre de Cristo WSA, would be damaged by any reductions in size.

I support the 1971 RMA II Guidelines study, recommendations, and F.H. Williams' designation of all 5 areas.

Also, I oppose the concept of allowing timber cutting, roadbuilding, and oil and gas leasing and exploration on WSA and Wilderness areas. The concept of Wilderness ~~is~~ is not commensurate with these activities. Allowing them on WSAs precludes the possibility of future designation without responsible and low impact, consultation and, most importantly, time.

Thank you for this opportunity to comment.

Ed Futral  
Edmund Futral  
5 W. Willamette St.  
Cole Spr., OR  
80413

76-54

RESPONSE TO LETTER 76-54

12/1/82

Thank you for your letter.

Jack Albright, Project Manager  
BLM  
Royal Gorge Reserve Area  
P.O. Box 1470  
Canyon City, CO 81212

Re: Wilderness

Please support 1971 RMA II Guidelines for the design of units and specific study areas. I oppose commercial/industrial development in these areas as well as the Grand Staircase, Beaver Creek and Buffalo Peaks WSAs.

Thank you for taking my views into consideration.

Sincerely,  
Michael Futral

Michael Futral  
131 N. Cascade #11  
Cole Spr., CO 80403



77-55

Jack Albright,  
Project Manager  
Bureau of Land Management  
Royal Gorge Resource Area  
P.O. Box 1470  
Canon City, Colo 81212

RESPONSE TO LETTER 77-55

Thank you for your letter.

Dear Sir,

12/1/82

I wish to express to you my opinion on matters concerning the five wilderness study areas in Colorado, currently being discussed by your office. These are Greenhorn Mountains, Beaver Creek, Buffalo Parks, the Spanish Peaks and the Sangre de Cristo W.S.A. I strongly support your recommendation for the first three areas listed, but wish you to recommend full wilderness designation for the Spanish Peaks and the Sangre de Cristo. Please this is absolutely mandatory in the start of the preservation of our wilderness and natural wildlife. So much depends upon this, please, act wisely. Thank-you for allowing me the time to express myself.

Sincerely,

Bruce Barbank

78-56

RESPONSE TO LETTER 78-56

Thank you for your letter.

140 South Lafayette Street  
Denver, Colorado 80209  
November 30, 1982

Mr. Jack Albright, Project Manager  
Bureau of Land Management  
Royal Gorge Resource Area  
P.O. Box 1470  
Canon City, Colorado 81212

Dear Mr. Albright:

We are writing to you to comment on the Draft Environmental Impact Statement for the Beaver Creek Wilderness Study Area (CD-050-016).

While we were glad to see that the BLM recommended Alternative B, Partial Wilderness Designation II, we would have preferred Alternative C, Partial Wilderness Designation I. Alternative C would have eliminated almost 5,000 acres from the all-wilderness designation, Alternative A, to make a more manageable wilderness area and to eliminate a resource conflict with recreation. This seems very sensible. On the other hand, we are opposed to Alternative D's additional elimination of 4,000 acres in the Holbert drainage. In our opinion the proposed firewood harvest does not justify destroying this natural and undisturbed wilderness area.

Please add this letter to the comments, indicating that we support Alternative B, but would prefer Alternative C.

Sincerely,

Alan B. Lilly

Alan B. Lilly

Margaret Leavitt  
Margaret Leavitt

cc: Senator Gary Hart  
Senator William Armstrong  
Representative Patricia Schroeder

5-74

11/22/82

Mr. Jack Albright  
Bureau of Land Management  
Royal Jorga Resource Area  
P.O. Box 1470  
Canyon City, CO  
81212

RESPONSE TO LETTER 79-57

Thank you for your letter.

Dear Mr. Albright,

Please include the following letter in the Hearing Record (public record) for recommended wilderness areas.

After reading the draft environmental impact statement for the Canyon City district, and several other documents pertaining to this district, I have felt the need to express my opinion about the areas that have been recommended for wilderness designation. Specifically, I would like to discuss the following areas: Brown's Canyon, McIntyre Mills, Upper and Lower Grand Creek, Beaver Creek, Sand Castle, and San Luis Mills.

#1) Brown's Canyon. The BLM should recommend that all 6,314 acres of the Brown's Canyon area be designated as wilderness area, with the exception of the Ruby Mountain area to the north (Ruby Mountain already has too much recreational use to pursue wilderness designation). Brown's Canyon area be considered jointly with the contiguous Aspen Ridge NAD 2 Forest Service area, in spite of the fact that my lumber roads have recently appeared in the Aspen Ridge area. The overwhelming opportunities for solitude and primitive-type recreation diminish the effects of a few lumber roads to null.

The Colorado State Air Pollution Control Commission has recently stated that the air in the Brown's Canyon area is of high quality. Sulfate Vials and Sulfate, only 10 miles away, pose no air pollution problems.

The DEIS reports that minerals and ores in the area are of low grade and of no economic value. Fluorspar, although moderately plentiful outside the area, occurs infrequently within the area because of a north-south fault between the USA and the mining area. Extraction of Fluorspar is therefore uneconomical. Copper extraction in the past from the Serrilla Mine is apparently no longer feasible. Vanadium has been mined around the area but is not economically important within the USA. Quantities and quality (grading material) is not available in economical amounts, especially since the market for these minerals is limited. There is no potential for oil, gas, or coal in the area. Even though Brown's Canyon lies within the Rio Grande Rift zone, the potential for geothermal energy is practically non-existent. Wilderness designation

79-57

(2)

of Brown's Canyon would have no impact on mining operations, since mining is in operation and the potential for future development of ores is minimal or non-existent.

Ground water is very scarce and most drainages in the area are ephemeral. Residential or commercial development is therefore highly improbable, and even domestic or livestock watering is unlikely.

The USA is marginal at best for livestock forage production or grazing. No range improvements are planned for the entire area.

This USA contains only 479 acres of productive forest land, of which only a meager 65 acres are potentially operable. I question the validity of any operable forest land in this area, since the terrain is very rugged and steep. The purported loss of almost 80,000 cords of firewood and 1,826 Mbf of saw timber is very difficult to believe. The topography of the region is simply too difficult to allow any significant lumbering operations. As stated in the table on page 59 of the DEIS there may be about 10,000 cords of firewood and 416 Mbf of saw-timber available and 65,000 cords of firewood and 4,560 Mbf of timber total available, but logging this wood would be extremely difficult and therefore uneconomical, considering the topography of the area and the difficulty of access to it.

This USA supports mule deer, mountain lion, several species of raptors, and a recently transported herd of bighorn sheep. It also supports adequate or abundant wildlife browse, such as mountain mahogany, shrubby, and Gambel Quail. Wilderness designation would protect these resources for future generations. The five spring developments planned for this area do not conflict with wilderness designation. Furthermore, this USA borders the Arkansas River for a considerable distance. This stretch of river supports a healthy brown trout population. It is imperative that this section of the Arkansas be free of development or the adverse effects of development in the Brown's Canyon area. Otherwise the trout population would suffer and revenue from fishing licenses as well.

Brown's Canyon is within a five hour drive of six major population areas, representing over 3.5 million people. This relatively easy access makes wilderness designation desirable.

Both the short- and long-term effects on local employment and income are negligible, if this area is designated as wilderness. The DEIS estimates that over \$11,000,000 dollars of mineral extraction would be necessary to affect Chaffee county employment. As I stated above, the potential for mineral extraction is very low. The DEIS also states that wilderness areas would gain \$76,000 and total losses would be \$150,000, if this area becomes wilderness. This difference is negligible, especially since the figure of \$150,000 is based upon the harvest of most of the timber and firewood in the area, which I have already shown to be unreasonable.

5-75

(3)

#2) McIntyre Hills. I understand that the BLM has had long term plans for timber, range, and ORV use for the McIntyre Hills area. I therefore concur with the BLM's non-wilderness recommendation for this area.

#3) Upper and Lower Grape Creek. The BLM should recommend that the Upper and Lower Grape Creek areas be designated as wilderness areas in their entirety. There should be two small exceptions to this however: (a) the northwest boundary of Lower Grape Creek should be drawn along a line that separates Sunset City Gulch drainage and Goat Park Drainage, so that the heavily used Sunset City Gulch area is excluded and (b) the small southeast portion of Upper Grape Creek, where there are some mining claims, should be excluded.

Page five of the DEIS states that non-wilderness designation of Upper Grape Creek would eliminate restrictions on mineral development that would accrue if the area were given wilderness status. This statement seems rather absurd, since the mineral potential of this USA is so low. Referring to the BLM River Minerals Study by Robert Civer, March 12, 1982, we find that timber in South Grape Creek is of poor grade to be valuable, most of the good copper properties have already been patented, if all the small remaining copper prospects were realized the possibility for economic success would still be marginal at best, and that in general the minerals throughout the USA's are of low grade. Using mineral development as an argument against wilderness designation of these USA's is unconvincing.

The BLM is recommending non-wilderness designation of these areas because of supposed lack of scenic value. There seems to be some confusion about the definition of a wilderness area. The requirements for different designations include naturalness, size, and opportunities for solitude and primitive and unconfined recreation. Scenic value, or panoramic views, is by no means a prerequisite for an area to be considered for wilderness designation. These USA's are among the few remaining BLM properties that are truly pristine and undeveloped. Together the size of these USA's exceeds 2,000 acres, which is certainly large enough for anyone to find solitude and enjoy primitive recreation.

The DEIS emphasizes the timber, grazing, hunting, fishing, minerals, and ORV resources that the BLM would like to develop in these USA's. Is there any reason why these activities and resources could not be exploited in nearby areas that do not possess wilderness qualities?

As in the Brown's Canyon/Aspen Ridge areas, there is a future possibility of joining the Tanager Peak Forest Service

(4)

area with these USA's into one wilderness area. The BLM should set a precedent by recommending these USA's as wilderness areas, with the potential for expansion in the future by the addition of the Tanager Peak area.

The DEIS suggests that both wildlife and motorbike use should be increased. These activities would be heaviest along the streams that run through the USA's. There appears to be a conflict in priorities. With wilderness designation wildlife management would take precedence, thereby eliminating the conflict.

#4) Beaver Creek. I support wholeheartedly Alternative C in the DEIS, as recommended by the BLM. Alternative C retains 20,750 acres, out of a possible 26,150 acres, and eliminates three small extensions to the USA where there is an apparent conflict with recreation. However, I staunchly oppose Alternative G, which eliminates 4000 acres south of the Milbert drainage. BLM appears to prefer Alternative G because of the potential for timber harvests in the southeast corner of this USA. There are only 777 acres within the entire USA that contain sawtimber and firewood, much of which is south of the Milbert drainage area. The terrain in this area is extremely rugged and steep, making lumber cutting very difficult. The rather insignificant economic value of timber from the southeast corner of the USA is far outweighed by the presence of habitat for deer, elk, fish, reptiles, mountain lion, and bighorn sheep.

Beaver Creek can be reached in 5 hours from six major metropolitan areas. It is important that we retain wilderness areas within reasonable driving distance, so that a large number of people can enjoy the benefits that accrue from visiting and experiencing wilderness environments.

The DEIS states correctly that the possibility of mineral development within the USA is minimal. Some fluorite and nepheline is scattered throughout the area, but not in significant concentrations. No uranium has been found. There is no coal, oil, gas, phosphate, or geothermal sources in the area. No gold has been found.

The entire area is marginal at best for use as grazing land. No range improvements are planned for this area.

Beaver Creek is one of the outstanding USA's in Colorado. The opportunities for solitude and a wilderness experience are higher here than in any other area. This fact, coupled with the lack of timber and timber resources and this area's unsuitability for development, suggest to me that Beaver Creek should definitely be recommended as a wilderness area.

(5)

#5) Sand Castle. I believe Sand Castle, a tiny area of only 1,844 acres, should be recommended as a wilderness area, primarily because it would be a valuable addition to the adjacent Great Sand Dunes National Monument. The DEIS states that wilderness designation of this area would have no impact on range, forestry, and wildlife. There are no known mineral deposits in the area and little potential for discovery of new deposits. BLM prefers Alternative C, which eliminates 160 acres from the USA, because of a supposed problem with management of this acreage. This is preposterous. The additional acreage is so small and so close to the main USA, only 7 miles, that management would pose no problem whatsoever. Alternative A should be accepted.

#6) San Luis Hills. I support Alternative A, except that a small portion in the northeast should be excluded because of some mineral activity there. Other than this small area the USA contains very little mineral potential, as stated on p. 46 of the DEIS.

There is no operable forest land within San Luis Hills.

A unique feature of this USA is the fact that it supports a piñon/juniper forest above 7000 feet, where one usually finds conifers. This unique ecological situation should be preserved for scientific study. Also, this USA represents one of only two areas with a "rugged mountain shrub prairie vegetation classification". Preservation of San Luis Hills would be valuable to the National Wilderness Preservation System because it would add an area with this classification.

The rangeland in this area is marginal and no range improvements are planned.

For all the reasons stated above, I believe the BLM should recommend wilderness designation for all the USA's in the Canyon City district, with the exceptions as stated. The total acreage that is being considered for wilderness is very small and will have a minimal impact on the economic base of this region. The benefits derived from these areas with respect to wilderness experiences are significant. They should be preserved.

Sincerely,  
  
 Richard Reynolds  
 2245 Grove St.  
 Boulder, CO  
 80302

80-58

November 30, 1982

RESPONSE TO LETTER 80-58

Thank you for your letter.

Jack Albright  
 Bureau of Land Management  
 Royal Gorge Resource Area  
 P.O. Box 1470  
 Canon City, CO 81212

Dear Mr. Albright:


I am writing to comment on the BLM wilderness recommendations in the Canon City district.

Except for the appropriate wilderness recommendation for the Beaver Creek (Alternative C) and Brown's Canyon areas, the BLM plan overemphasizes timber, mining, and ORV uses at the expense of wilderness protection in the few remaining BLM roadless areas in southern Colorado.

Specifically, I believe that strong wilderness attributes warrant wilderness protection for most of the Upper and Lower Grand Creek and San Luis Hills areas. These areas have little economic value (except, perhaps, a small part of the San Luis Hills) but are rich in wildlife and other wilderness values.

I request that these comments be included in the hearing record.

Thank you,

Sincerely,  
  
 Richard Reynolds  
 4331 Eldorado Springs Dr  
 Boulder, CO 80303

Dear Jack Albright,

I would like to see the Wilderness Study areas of Grand and Cristó and Spanish Peaks to be entirely saved. In fact, I would like to see more Wilderness areas everywhere, and all current wilderness areas to remain completely intact. I believe wilderness areas are vital to preserving our environment and our sanity. How can we be mentally healthy without beautiful retreats? I will oppose timber cutting, oil or mineral mining, roads, oil or gas leasing and machinery in Wilderness study areas.

Thank you for your time,

Susan Hedger  
352 E. Utah  
Colorado Springs, Co. 80903

RESPONSE TO LETTER 81-59

Thank you for your letter.

82-60

## Colorado Wilderness Network

2029 San Carlos • Denver Colorado 80206 • 573-7870

December 2, 1982

Jack Albright, Project Manager  
Bureau of Land Management  
Royal Gorge Resource Area  
P.O. Box 1470  
Canon City, CO 81212

Dear Sir:

Enclosed are our comments on the Canon City District Wilderness Planning Amendment DEIS. We request that these comments be made part of the hearing record.

We prefer alternatives recommending wilderness suitability for all of Brown's Canyon and Sand Castle, and alternatives recommending partial wilderness for McIntyre Hills, Upper and Lower Snake Creeks, Beaver Creek, and San Luis Hills.

The DEIS is deficient in several respects. The DEIS does not adhere to the BLM Wilderness Study Policy concerning consideration of special features. The DEIS does not give detailed consideration to all of the alternatives, as required by NEPA. The DEIS does not consider in good faith all of the alternatives, as required by NEPA.

The wilderness resources of the MAs of the Canon City District are found in only a small portion of Colorado. Timber, minerals, rangeland available to manipulation for both livestock and big game, and opportunities for motorized recreation abound throughout the state. There is no wilderness resource unique to any of the MAs which cannot be obtained at equal or less cost elsewhere. For these reasons, wilderness should be the preferred alternative for every MA.

Sincerely,

Michael Scott

*Michael Scott*  
The Wilderness Society

Mark Pearson

*Mark Pearson*  
Colorado Open Space Council Board Member

## Colorado Wilderness Network

9239 East Colfax • Denver, Colorado 80006 • 573-7870

Roe McElellan

Roe McElellan  
Colorado Wilderness Network

Kirk Cunningham

Kirk Cunningham  
Bros Mills Chapter, Sierra Club

Denise Dralle

Denise Dralle  
CU Wilderness Study Groupcc: George Francis, BLM State Director  
Rep. Ken Kramer  
Rep. Ray Kosovsek  
Sen. Gary Hart  
Sen. William Armstrong  
Dewitt John, Colo. Dept. of Nat. Resources

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82-60

RESPONSE TO LETTER 82-60

Response 1

The recommendations of Beaver Creek, Brown's Canyon, and Sand Castle as suitable for wilderness are to be applauded. This represents the first non-alpine wilderness recommended by BLM for wilderness designation and is a commendable first step. However, the overall anti-wilderness bias of the Canon City District Wilderness Planning Amendment DEIS is disappointing. It is felt that the method of analysis which resulted in only 25,258 acres out of 82,958 studied acres being recommended as suitable for wilderness was inherently weighted against wilderness, as will be demonstrated. The 57,610 acres found unsuitable as wilderness is even more discouraging in view of the 34,200 acres previously dismissed from wilderness consideration in the Canon City District at the conclusion of the Intensive Inventory.

The value of natural environments is lost and BLM's preference for and emphasis on production. Every reference to loss of a potential increase in some resource concerns only resources of direct economic benefit to man. No value is attached to maintaining or increasing pristine ecosystems which have yet to be manipulated for human consumption. The natural ecosystems of the WSAs are seen only as potential game farms and tree farms. In every analysis, wildlife resources are considered to be only the game species, namely deer, turkeys, big horn sheep, and game fish.

"Improving" wildlife habitat applies only to efforts to increase populations of these few game species. The analyses for McIntyre Hills, Lower Grape Creek, Upper Grape Creek, and San Luis Hills conclude that wilderness will have significant impacts on wildlife resources because it might prevent an increase in populations of one or two selected game species. Diversity of wildlife is nowhere considered. Non-game species such as songbirds and reptiles are nowhere considered. This lack of consideration of the environmental consequences of the alternatives on non-game species of wildlife as performed in Chapter IV of the DEIS is in violation of Section 102 (2) (C) of the National Environmental Policy Act (NEPA) which requires a detailed statement of the environmental consequences

In the FEIS, losses of potential increases are not discussed, only direct losses or increases. Although diversity of wildlife is considered, if the total acreage of vegetation were manipulated as proposed by all resources, small game and nongame species composition and numbers would vary locally. However, composition and numbers would not significantly change in the long term because of the habitat diversity offered by public lands, the dispersed nature and size of each project, and the short-term nature of disturbance in each project area.

Therefore, as discussed in Chapter 1, only the wildlife habitat and populations of mule deer, bighorn sheep, and turkey are issues for the WSAs.



of any proposed action. The failure to consider the impacts of the alternatives on non-game species constitutes a failure in compliance with NEPA.

The courts have ruled (*Environmental Defense Fund v. Corps of Engineers*) that:

"At the very least NEPA is an environmental full disclosure law... the 'detailed statement' required should, at a minimum, contain such information as will alert the President, the NEA, the public, and, indeed, the Congress, to all known possible environmental consequences of proposed agency actions."

The DEIS does not adequately meet this condition due to its narrow focus on game species of wildlife.

The DEIS violates the requirements of NEPA for "full good faith consideration of the environment." The court found, in *Calvert Cliffs' Coordinating Committee v. Atomic Energy Commission*:

"Only once—in Sec. 102(2)(B)—does the Act state, in terms, that Federal agencies must give full 'consideration' to environmental impact as part of their decision making processes. However, a requirement of consideration is clearly implicit in the substantive mandate of Sec. 101, in the requirement of Sec. 102(1) that all laws and regulations be 'interpreted and administered' in accord with that mandate, and in the other specific procedural measures compelled by Sec. 102(2). Thus a purely mechanical compliance with the particular measures, required in Sec. 102(2)(B)(i) will not satisfy the act if they do not amount to full good faith consideration of the environment... The requirements of Sec. 102(2) must not be read so narrowly as to erase the general import of Sections 101, 102(1), and 102(2)(A)(B)."

The NFP pre-dating FLPMA clearly indicated non-wilderness uses for all of the WGAs deemed unsuitable as wilderness. It is interesting to note that of the areas recommended as suitable for wilderness, one (Sand Castle) is a tiny addition to existing wilderness while the other two (Brown's Canyon and Beaver Creek) were proposed as primitive areas prior to enactment of FLPMA. The DEIS is thus obviously a continuation of existing management plans and represents no attempt at

"full good faith consideration" of wilderness as an alternative.

The economic analysis in the DEIS is inadequate as it compares oranges and apples, i.e., the DEIS compares the direct economic benefits due to wilderness designation with indirect potential economic costs. John Loomis, Colorado State University economist, succinctly summarizes this economic fallacy of the DEIS (see attached memo in Appendix A):

"NEP presents an unequal treatment of benefits and costs of wilderness. The national gains associated with wilderness are direct gains. The national losses are potential. The two cannot be compared. NEP only are the direct gains usually larger than the potential losses, but the direct gains will likely occur whereas the potential losses may never occur." (emphasis added)

For every WGA, with one exception, the direct economic benefits of wilderness outweigh the direct economic costs due to wilderness. It is only by the introduction of potential economic factors that may well never occur that non-wilderness can economically compete with wilderness designation. As economist Loomis notes, "The nation can be made better off by designation."

Upper and Lower Grape Creek WGAs are the two areas most obviously disqualified from wilderness suitability by the aforementioned scheme of deducting the cost of non-existent resources from wilderness benefits. Most unfortunately, this method of accounting for non-existent resources is not applied equitably between wilderness and non-wilderness alternatives. For example, in the case of Lower Grape Creek, the loss of a potential increase in non-wilderness recreation (133 back-country vehicle use days and 20 fishing days) is cited as an effect of wilderness designation. There is no similar reference to a loss of a potential increase in wilderness recreation due to non-wilderness designation. This biased weighting towards non-wilderness is repeated in the analysis of Upper Grape Creek. Full good faith consideration of wilderness as required by NEPA is again lacking.

## Response 2

The analysis has been revised and "Impacts on Economic Conditions" has been dropped from further analysis as discussed in Chapter 1.

The supplemental wilderness values of the WSAs have been overlooked. Component No. 2: Special Features of Criterion No. 1: Evaluation of Wilderness Values of the Wilderness Study Policy states that:

"...these characteristics should also be thoroughly considered when assessing an area's overall value as wilderness." (emphasis added) "These special features of the area and the degree to which their presence enhances its suitability for wilderness designation should be addressed through consideration of the area's ecological, geological, scenic, and cultural features, and its scientific and education values".

There has been no consideration of the scientific and education values of special features in any of the WSAs. For example, San Luis Hills is the only representative of a high desert biome ecosystem anywhere in the state, just one among many unique ecological features. Yet little mention is made of these special ecological features, and no mention is made of the scientific and educational values inherent in such unique features.

The Colorado Natural Areas Program has concluded that "it would not be appropriate to state that previously unknown taxa might occur" in Upper and Lower Grape Creek WSAs (see Appendix B). No consideration is given to this possibility in the DEIS.

As yet another example, the DEIS notes time and again (pp. 34,38,42) that "little information exists" relating to cultural resources in the WSAs. How can there have been "thorough consideration" of the scientific and educational values of the cultural resources of the WSAs if the extent of the resource is not even known? How can the degree to which the presence of special features enhances the suitability of the area for wilderness designation be considered when the extent of this presence is unknown? A definitive decision concerning wilderness suitability can not be made in light of this lack of information. Obviously, both Class I and Class II Cultural Resources Inventories are required in order to satisfy the requirements of the Wilderness Study Policy. These have not been conducted.

Criteria Used to Analyze Suitability and Nonsuitability, found in Appendix A of the DEIS, gives the criteria concerning Public Comment:

"The SWM wilderness study process will consider comments received from interested and affected publics at all levels--local, state, regional, and national--with special consideration given to the involvement of those local people and institutions that would be most directly affected by designation of an area."

The Wilderness Study Policy requires special consideration of local social and economic effects. However, the requirement of special consideration for local comments, as proposed in the Draft Wilderness Study Policy, was dropped. Clarification as to which study policy is being used and the exact wording of the public comment section would be appreciated.

The DEIS is inconsistent in its treatment of alternatives between the WSAs. The contribution of wilderness designation to the geographic distribution of wilderness is considered for some WSAs, but not for others. Losses of potential increases in recreation due to wilderness designation is irregularly applied. Loss of potential increases in recreation due to non-wilderness designation is never mentioned. Uniform methods of analysis should be applied to all of the alternatives of all the WSAs.

Area specific comments follow.

### Response 3

Special features including ecological, geological, scenic, and cultural features of a WSA, as well as scientific and educational values, have been considered for each WSA.

However, as stated in Chapter 1 of this FEIS, Lower and Upper Grape Creek are the only WSAs with identified special features. As a result special features are only discussed for these two WSAs in Chapter 3.

The high desert biome ecosystem does not provide sufficient uniqueness to be considered as a significant special feature. However, ecosystems have been identified by the Bailey-Kuchler Ecosystem map of ecoregions in the United States. These have been considered for each WSA and are discussed under the San Luis Hills WSA, which represents a classification not commonly represented by other WSAs.

A Class I (existing data) inventory was performed and is considered to be sufficient basis to estimate the importance of the cultural resource in the WSAs.

### Response 4

As further stated in the referenced letter in this comment, the Colorado Natural Areas Program has said, "None of the WSAs are known to contain any taxa of national or potential national significance." However, the document has been changed to recognize the occurrence and/or potential occurrence of the following FWS Category 2 plant taxa:

- McIntyre Hills WSA, Penstemon degeneri is known to occur. This species may also occur in the Lower and Upper Grape Creek WSAs; however, further field inventories would have to be conducted to verify this.
- Beaver Creek WSA, Bolophytia tetraeneuris is known to occur.
- Browns Canyon WSA, Eriogonum brandegei occurs adjacent to this WSA and potentially could occur in the WSA.

The above information has been incorporated into the Chapter 1, discussion of T&E species.

#### Response 5

A Class I (existing data) inventory was performed and is considered to be sufficient basis to estimate the importance of the cultural resources in the WSAs.

Nowhere in the Wilderness Study Policy (Federal Register, Vol. 47, No. 23) is a level of documentation mentioned for cultural resources.

The State Historic Preservation Officer is in concurrence with our approach (see Letter 16-95 and Chapter 1).

It should also be noted that development on public lands requires inventory and mitigation for cultural resources, thus providing legal protection, which occurs whether or not an area is designated as wilderness.

#### Response 6

Appendix A, Criteria Used to Analyze Suitability and Nonsuitability has been removed from this FEIS.

In the DEIS we inadvertently gave the criteria from the Draft Wilderness Study Policy (Federal Register, Vol. 45, No. 246, December 19, 1980) instead of the final Wilderness Study Policy (Federal Register, Vol. 47, No. 23, February 3, 1982). The correct criteria to determine suitability or nonsuitability based on public involvement is as follows:

"In determining whether an area is suitable or unsuitable for wilderness designation, the EIM wilderness study process will consider comments received from interested and affected publics at all levels—local, State,

Lower Grape Creek (CD-050-014) and Upper Grape Creek (CD-050-017)

Upper and Lower Grape Creek WSAs will be discussed together since they share similar resources and are essentially one area, though split by a dirt road.

The recommendations of Upper and Lower Grape Creek WSAs as unsuitable for wilderness is extremely disappointing. There are no overriding resource conflicts with wilderness. Rather, the areas have been listed by the inherent anti-wilderness analysis methods of the DEIS.

(1) The April, 1979 MFP of the Royal Gorge Planning Unit clearly states plans to provide for motorized recreation along Grape Creek. The MFP states that "the Grape Creek corridor is recommended to be managed as semi-primitive motorized." It is unlikely that wilderness consideration for Upper and Lower Grape Creek, as mandated by PLANA of 1976, received consideration equal to that of the pre-existing MFP calling for non-wilderness uses. There is a distinct lack of full good faith consideration of wilderness as an alternative in the DEIS.

(2) There is an inordinate emphasis on losses of potential increases in resources if the area is designated wilderness. As noted previously, CSU economist John Loomis has pointed out the economic fallacy of comparing uncertain potential future losses due to wilderness to the present direct gains from wilderness. In the DEIS (p. 61), direct economic gains of wilderness designation outweigh direct losses by a factor of 2 to 1.

(3) The questionable practice of using loss of potential increases in recreation is not evenly used throughout all of the alternatives. A loss of a potential increase of 133 trail miles and 20 fishing recreation days is listed as an impact of the All Wilderness alternative for Lower

regional, and national. Wilderness recommendations will not be based exclusively on a vote-counting majority rule system. The ELM will develop its recommendations by considering public comment in conjunction with an analysis of a wilderness study area's multiple resource and social and economic values and uses."

Response 7

The geographic distribution of wilderness is not considered in the FEIS; however, it will be considered in the Wilderness Study Report, which will accompany this FEIS to Congress.

In this FEIS the impacts of wilderness designation and nondesignation on recreation use have been expanded and are fully considered for each WSA.

Response 8

Although the DEIS did show losses of potential increases, this FEIS only shows direct losses or increases. This analysis is consistent among all resources in each WSA.

Response 9

Emphasis has been placed on item 8 of the summary and conclusion section of the "Mineral Resources of the Arkansas Canyon Planning Unit with Special Emphasis on the Grape Creek Wilderness Study Areas and the McIntyre Hills Wilderness Study Area," by Robert Coker. In its complete context, item 8 states "Overall the entire area has little economic potential. The mineral occurrences are small and though locally of fairly high grade, (emphasis added) are generally low in character." This would indicate that in considering the entire 225-square-mile area the prospects for discovery of significant mineral resources are generally low; however, the potential is identified in both

Grape Creek, yet the No Wilderness alternative has no similar loss of a potential increase in hike/wilderness user recreation days. If such an analysis is to be used, should it not be applied equally to all alternatives? The DEIS has not treated the alternatives in a comparable manner.

(4) The documentation concerning minerals is poor. Site specific information concerning the mineral potential of Lower Grape Creek is available but is not reported any manner in the DEIS. Summaries or abstracts of this information could easily have been included in the DEIS, but instead only the fact of its existence is mentioned. This is very unhelpful to the public at large wishing to learn of the specific mineral potential for the area.

The lack of mineral documentation is particularly questionable since Lower Grape Creek is deemed unsuitable for wilderness designation partially because of supposed mineral conflicts. Page 11 of the DEIS states that the area has "a mineralized zone extending across the unit" which could not be omitted because the "boundary change would have omitted the scenic Grape Creek from the unit and left a portion which contains the cumulative impacts of old mines." This statement indicates mineral conflicts as a reason for wilderness unsuitability. However, the actual mineral report by Mining Engineer Robert J. Coker makes several pointedly different conclusions:

- (1) The entire area is subeconomic at current metal prices (March, 1982)
- (2) The mineral occurrences are small and, though locally of fairly high grade, are generally low grade in character.
- (3) Even if all the small copper prospects were brought into production simultaneously, the chances for economic success would still be marginal and short lived due to low grade and reserves.

This information is not plainly stated in the DEIS. The DEIS claims (p.34) that some production could occur that "could be marginally profitable at 1980 metal prices." Obviously, mineral production can not be both

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9 "subeconomic" and "marginally profitable" at the same time. The DEIS unfairly twists the mineral report to indicate marginal profitability, whereas as the tone of the report is one of unprofitability. This is not obvious from the DEIS since no documentation was provided in the DEIS.

10 (5) Through consideration of supplemental wilderness values of the area is lacking, though such consideration is plainly required by the Wilderness Study Policy. On page 35 of the DEIS, it is stated that cultural resources in Lower Grape Creek are "not significant." Yet the next sentence notes that "definitive statements concerning this preliminary" cannot be made since little information exists. This indicates the need for a Class II Cultural Resources Inventory in order to fulfill the requirements of the Wilderness Study Policy.

11 (6) The scientific and educational values of the WGAs are nowhere thoroughly considered, though the Wilderness Study Policy plainly states that they must be. The Colorado National Areas Program concludes that "previously unknown taxa might occur" in Upper and Lower Grape Creek. No consideration is given in the DEIS to the scientific and educational values of this and other special features, as required by the Wilderness Study Policy.

12 (7) The Bally-Kutler Ecosystem map does not adequately address the issue of diversity within the wilderness system. Upper and Lower Grape Creeks represent granite canyons and surrounding rolling hills ranging in elevation from 5000 to 8000 feet. Nowhere else in Colorado is similar terrain included in the wilderness system. A system which simply looks at vegetation as a basis for diversity will result in gross oversights, as has occurred here. The granite canyon of Grape Creek ranks as one of the very few natural drainages of such landform type along the Front Range.

The unsupported statement in the DEIS that there exist 131,300 acres of pine Douglas-fir ecosystems in designated wilderness is of no help to the reviewer wishing to ascertain if this existing wilderness

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12 is actually environmentally similar to Grape Creek in terms of landform. It would be appreciated if the areas of claimed similarity were identified. A more thorough analysis of ecology in the DEIS is necessary in order to allow for careful determination of the areas' contribution to diversity.

13 (8) The emphasis on wildlife is extremely narrow. "Improving" existing wildlife populations (pp.60,70) apparently means increasing the numbers of a very few game species, namely deer and turkeys. Diversity of wildlife species is ignored in the analysis. The beneficial effects of wilderness on songbirds and raptors is ignored in the analysis. Wildlife benefits have been reduced to the effects on two species. The loss of hypothesized potential increases in the two game species is stated as a significant impact on wildlife, while no reference is made to any effects on any other species. There has not been detailed consideration of the environmental consequences of all of the alternatives, as required by NEPA.

14 (9) The statement that "wilderness designation would have significant, short- and long-term impacts on improvement of terrestrial wildlife resources" (pp. 60,70) does not hold up under closer inspection. BLM wildlife biologists have stated that the areas "are amenable to non-interactive wildlife habitat management" (Eric Breke). The fact is that wilderness will not adversely effect wildlife; it will only adversely affect current BLM wildlife habitat manipulation plans, plans pre-dating FLUPA and the Wilderness Inventory.

(10) The planned wildlife habitat manipulations and water catchments are apparently situated along the creek corridor and side drainages, the same localities where intensive trail side use is contemplated. Are these not incompatible uses? Wilderness designation is the more suitable complement to wildlife.

the Coker report (introduction and conclusion/summary) and the Barringer Resources investigation. In particular the following areas within and adjacent to the Lower Grape Creek WSA were identified as having mineral potential: Green Mountain Mine; 2) Copper Gulch; 3) Horseshoe Mine; 4) Goat Park; 5) Sunset City; 6) El Plomo Mine; 7) Columbine Mine; 8) Copper Girl and Valley View. Although currently delineated ore reserves are inadequate to engage in active developments at this time, the potential for development and discovery is quite evident. The developed workings identified in the Coker reports are for the most part confined to the upper oxidized portion of the deposit and very little is known concerning the mineralization at depth. For these reasons and the favorable depositional environment of the area as identified by E. W. Heinrich in "Precambrian Tungsten and Copper-Zinc Skarn Deposits of South-Central Colorado" the area was identified as having potential for mineralization.

It should be reiterated that the Lower Grape Creek WSA was the only WSA to have mineral potential; Upper Grape Creek and McIntyre Hills were identified as having only limited potential, which is in agreement with the references cited.

Since it is not practical to include documentation of all reports referenced in the environmental impact statement, the DEIS does state that "Both reports are available for review at the Canon City District office."

#### Response 10

Please see Response 5.

#### Response 11

Special features including ecological, geological, and scenic features, as well as scientific and educational values, have been considered for each WSA.

However, as stated in Chapter 1 of this FEIS, Lower and Upper Grape Creek are the only WSAs with identified special features. As a result special features are only discussed for these two WSAs in Chapter 3.

As further stated in the referenced letter in this comment, the Colorado Natural Areas Program has said, "None of the WSAs are known to contain any taxa of national or potential national significance."

#### Response 12

Although there are many varied land classification systems available, KLM has selected the Bailey-Kuchler Ecosystems of the United States system (Bailey, 1976 and Kuchler, 1966). This system was selected because it is a land classification system that facilitates planning at the national level. In addition, it provides a broad synthesis of current knowledge about the ecosystem geography of the country. It also serves as a useful reference for those who desire an overview on a comparative basis for ecosystem and landform representation in existing and potential National Wilderness Preservation System (NWPS) units.

The designated wilderness areas that have acreage in the pine Douglas-fir ecosystem are all administered by the USFS and include: Cache La Poudre—12,000 acres; Lost Creek—40,000 acres; Weminuche—55,000 acres; and West Elk—24,300 acres.

Further explanation of the Bailey-Kuchler Ecosystems land classification system is in Chapter 3 "General Description." As stated in Chapter 3, detailed information on ecosystems and landform classifications are in the management situation analysis, which is available in the Canon City District office.



#### Response 13

In the FEIS, losses of potential increases are not discussed, only direct losses or increases. Although diversity of wildlife is considered, if the total acreage of vegetation were manipulated as proposed by all resources, small game and nongame species composition and numbers would vary locally. However, composition and numbers would not significantly change in the long term because of the habitat diversity offered by public lands, the dispersed nature and size of each project, and the short-term nature of disturbance in each project area.

Therefore, as discussed in Chapter 1, only the wildlife habitat and populations of mule deer, bighorn sheep, and turkey are issues for the WSAs.

#### Response 14

Wildlife presently in the wilderness study areas will not be adversely affected by wilderness designation. However, the present habitat condition in the areas is generally poor from the standpoint of habitat diversity. In some areas it is planned to improve the habitat through pinon-juniper manipulation so more vegetation/habitat types are present; e.g., mountain shrub, meadow, and grassland. Studies have shown that most pinon-juniper types, especially the more mature stands, are not as productive in numbers of birds or animals as the adjacent zones with their greater variety of plant species. Conversion of a closed pinon-juniper forest to a shrub, grass, and forb type will generally be beneficial to most wildlife species and particularly for deer. Most animals inhabiting the pinon-juniper type will have suitable, perhaps improved, habitat after treatment, provided areas are left for escape cover and edge effect. The small amount of such areas planned for conversion will not have a significant effect on those species requiring mature pinon-juniper forests.

The habitat manipulation projects, including water developments, would be designed to "open-up" habitat presently unoccupied by many wildlife species. Completion of these projects would only serve to increase wildlife diversity.

These plans did not predate FLMPA or the wilderness inventory. These plans were formulated for the Royal Gorge Unit Resource Analysis in 1979/80 and were submitted for public review at that time. No major objections were presented at these public meetings; therefore, these plans were carried forth into the Arkansas Canyon Habitat Management Plan (HMP) which was completed and approved in 1981.

(11) Further explanation of a statement on page 70 concerning grazing impacts of wilderness on Upper Grape Creek is required. It is stated that a decrease of 100 AUMs will occur over the long-term due to wilderness restrictions on thinning of piñon-juniper. This reduction of grazing AUMs can in no way be blamed on wilderness designation. As the 1980 Colorado Wilderness Act made abundantly clear, grazing is allowed to continue at its existing level in any newly designated wilderness areas. The fact that a reduction in grazing AUMs may occur if extensive clearing of piñon-juniper is not allowed indicates current overgrazing of the existing range. The carrying capacity of the existing range is being exceeded, a situation that wilderness designation would not affect in any manner whatsoever. The misleading implications of this statement on page 70, contrary to existing law, must be corrected.

(12) An additional supplemental value of the area lies in the unrestricted patronage of the nearby Sangre de Cristo. This scenic quality certainly falls under the supplemental values defined by the Wilderness Act and merits consideration.

(13) The existing possible and future uses of Lower Grape Creek include mineral potential and grazing (p.12). The wilderness unsuitability recommendation for the area partly stems from perceived conflicts with these uses. This is contradictory to the Wilderness Study Policy which states:

"Disqualifying a WSA from consideration as suitable for wilderness preservation based solely on assumptions about the future degradation of wilderness values resulting from mining and grazing activities which the Wilderness Act allows would be inconsistent with that act."

The current grazing practices and valid mining claims are both compatible with wilderness. The disqualification of Lower Grape Creek because of these activities is inconsistent with the stated intent of the Wilderness Study Policy.

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Recommendations:

Upper and Lower Grape Creek WSAs both obviously meet and surpass the criteria of the Wilderness Act. Consequently, wilderness suitability is recommended for both areas.

A partial wilderness alternative is recommended for Lower Grape Creek. It is proposed that the northeast boundary be drawn along Sunset City Gulch. This would exclude the most visible human imprints. The Horseshoe Mountain area encompassing the Tights is absolutely vital to the outstanding wilderness character of the area and cannot be excluded.

A partial wilderness alternative is supported for Upper Grape Creek. The entire area is proposed for wilderness with the exception of a small exclusion in the southeast corner in order to accommodate private inholdings.

Beaver Creek (20-050-016)

Suitability of Beaver Creek for wilderness, as recommended by the DEIS, is an obvious result of the area's superb wilderness characteristics. However, we do not concur in the deletion of the southwest portion of the WSA. The boundary alterations of Alternative C are all that are necessary for a manageable Beaver Creek wilderness boundary and should be the preferred alternative.

(1) It is stated in the DEIS (p.69) that the deleted southwest portion of the unit receives little recreational use because of its "steep rugged topography" which restricts access. Timber harvest is thus assumed to be a better use of the resources of this area of the WSA. However, it seems unlikely that access for purposes of firewood harvesting will be any easier than access for recreation. Undoubtedly, access roads will be necessary in order to provide for public access

Response 15

The chart referred to on page 70 should have shown the 100 AUMs as a loss of a potential gain and not a direct loss. In this FEIS losses of potential gains are not discussed, only direct losses or gains.

Response 16

If the northwest boundary were drawn along Sunset City Gulch as suggested, the portion of the WSA along Goat Park and Marsh Gulch, which has the cumulative impacts of man, would not be excluded.

The suggested boundary, which only ousts the land west of Sunset City Gulch, would not present any different issues or impacts than are currently addressed in the all wilderness alternative.

The partial alternative addressed in the FEIS would exclude an area from designation that has potential mineral conflict. This is done for the purpose of analysis of impacts and is not recommended by this document.

Response 17

The partial wilderness alternative for Upper Grape Creek omitted only 600 acres. Analysis revealed no difference in impacts or values in the portion omitted that warrant further consideration. The impacts are completely covered by describing the all wilderness alternative and there would be no significant reason to consider this partial alternative. As a result only the all wilderness and no wilderness alternatives are now considered for Upper Grape Creek.

Response 18

The proposed action for Beaver Creek has been changed from Alternative D - Partial Wilderness--II to Alternative C - Partial Wilderness--I. The southwest portion of the WSA, addressed in the comments, is included in the area for recommended designations.

18 to this timber in "steep rugged topography". Are these road costs anywhere considered?

- (2) What will be the erosional effects of timber harvest and road building in "steep rugged topography", particularly since the area contains soils of high and very high susceptibility to erosion (p.38)? Inclusion of this area within the recommended Beaver Creek wilderness would certainly have beneficial impacts on natural integrity by prohibiting activities with associated high erosion. No mention is made of the environmental consequences of the non-wilderness alternative in this respect, a violation of NEPA.
- (3) The DEIS correctly notes the totally separate processes of wilderness designation and Clean Air Act Air Quality classifications. The fears of the city of Colorado Springs that Beaver Creek will receive a Class I Air Quality classification if designated wilderness are completely unfounded. Reclassification of Beaver Creek from a Class II to a Class I area is a state prerogative. Federal land managers have no reclassification authority.

19 (4) The DEIS fails to comply with the Wilderness Study Policy by not giving thorough consideration to cultural values of Beaver Creek, a special feature of the area. No inventories have been conducted. Scientific and educational values are ignored also.

20 (5) Wildlife impacts are once again limited to deer and turkeys. All other species are ignored in the analysis of environmental consequences in the DEIS.

#### Recommendations:

Beaver Creek is one of Colorado's highest quality WSAs. Its proximity to major Front Range population centers such as Colorado Springs, coupled with its outstanding wilderness attributes, demands that as much acreage be protected as is possible. Alternative C accomplishes this goal with a minimum of conflict.

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#### Brown's Canyon (00-050-009)

BUM's finding of Brown's Canyon as suitable for wilderness is to be applauded. Brown's Canyon borders one of the last wild stretches of the Arkansas River, a river heavily used by white water enthusiasts. Brown's Canyon has outstanding geologic, archeologic, and wildlife values in addition to its superb solitude and opportunities for primitive recreation.

BUM has long recognized the superlative natural values of Brown's Canyon as is evidenced by BUM's pre-FLPMA proposal of primitive area status for it. The continuing recognition of Brown's Canyon's wilderness attributes is heartily endorsed. The area's ruggedness and remoteness precludes resource development incompatible with wilderness. As BUM notes in the DEIS, mineral potential is minimal. Timber harvest would undoubtedly be uneconomical given the location and terrain of the area and would represent an unwise use of the resources of the unit.

One concern is the exact location of the northern boundary of the area. Ruby Mountain receives heavy recreational use which may be incompatible with wilderness designation. Verification that the boundary for Brown's Canyon as proposed does not include lands with extreme non-wilderness uses or characteristics would be appreciated.

#### McIntyre Hills (00-050-013)

The Intensive Wilderness Inventory determined that McIntyre Hills possessed outstanding opportunities for both solitude and primitive unconfined types of recreation (p. 274 of Final WSA, Nov. 1980) in addition to its natural, roadless condition. McIntyre Hills' status as a WSA is recognition of its possession of the attributes necessary for wilderness designation as defined by the Wilderness Act. This in and of itself makes McIntyre Hills distinctive in the state as well as nationally since only 8% of Colorado can still be considered as wilderness and only about 0.5% of the continental United States.

The resource conflicts with wilderness designation of McIntyre Hills are minimal. Once again the "bogymen" of lost potential increases is resurrected in order to remove an area from wilderness suitability. The loss of non-existent big game animals and livestock is put forth as rationale for non-wilderness suitability, even though the direct economic benefits

#### Response 19

Please see Response 5.

Special features including ecological, geological, scenic, and cultural features of a WSA, as well as scientific and educational values, have been considered for each WSA.

However, as stated in Chapter 1 of this FEIS, Lower and Upper Grape Creek are the only WSAs with identified special features. As a result special features are only discussed for these two WSAs in Chapter 3.

#### Response 20

If the total acreage of vegetation were manipulated as proposed by all resources, small game and nongame species composition and numbers would vary locally. However, composition and numbers would not significantly change in the long term because of the habitat diversity offered by public lands, the dispersed nature and size of each project, and the short-term nature of disturbance in each project area.

Therefore, as discussed in Chapter 1, only the wildlife habitat and populations of mule deer, bighorn sheep, and turkey are issues for the WSAs.

of wilderness dwarf the direct economic costs. Timber is the only real conflict, yet the timber production base for the Canyon City District certainly does not depend on the 1,761 acres of operable woodlands in McIntyre Hills WSA. It is not reasonable that 1,761 acres of potential woodlands can outweigh the proven wilderness attributes of ten times that number of acres. Sacrificing 16,800 acres of the McIntyre Hills WSA because of timber conflicts with 10% of the area is unjustifiable.

Special features have been sighted in this area. "No significant cultural resources are shown to exist in this area." (p.33) Perhaps this is because no one has thoroughly searched the area. A Class II Cultural Resources Inventory is necessary before Component No. 2 of Criterion No. 1 of the Wilderness Study Policy has been satisfied.

Alternative C, Partial Wilderness Designation, is endorsed. This would allow for harvest of roughly half of the timber present while preserving the wilderness attributes of McIntyre Hills. This constitutes a more sensible approach than throwing an area out of wilderness consideration because of a conflict on 10% of its acreage.

#### Sand Castle (CC-050-135)

We concur in the recommendation of Sand Castle for inclusion within the Wilderness Preservation System. This tiny area is a natural extension of the adjacent Great Sand Dunes National Monument Wilderness. No resource conflicts with wilderness are present. Inclusion of Sand Castle within the adjacent Great Sand Dunes Wilderness provides for the most efficient management of these isolated parcels of BLM lands.

#### San Luis Hills (CC-050-141)

San Luis Hills is the most ecologically unique of the WSAs. It would provide a significant addition to the scientific diversity of the National Wilderness Preservation System. On this basis alone, San Luis Hills merits designation as wilderness. Exclusion of the northeast corner of the area as a concession to local interests is an acceptable alteration of the original boundary. Otherwise, the entire WSA should be deemed suitable for wilderness.

(1) The DEIS is deficient in its omission of thorough consideration of scientific and educational values of San Luis Hills WSA, as required

by Component No. 2 of Criterion No. 1 of the Wilderness Study Policy. No consideration has been given to the unique ecological values of San Luis Hills which offer numerous opportunities for scientific and educational pursuit. These include the following:

- (i) The San Luis Hills are part of an eroded, uplifted volcanic field associated with the Rio Grande Rift.
- (ii) The WSA displays the toleration limits of piñon-juniper. The piñon-juniper reaches its greatest extent at elevations of 8,500 to 9,000 feet, elevations normally reserved for ponderosa or Douglas fir. However, the extremely dry climate allows the piñon-juniper to exceed their normal elevational limits and to ignore usual coniferous succession.
- (iii) San Luis Hills WSA represents the only high desert biome in Colorado. There is no land of comparable ecology protected anywhere else in the San Luis Valley or in Colorado.
- (iv) The WSA offers rare coniferous cover to wildlife in the midst of many miles of surrounding plains.

None of these points were covered by the DEIS.

(2) Mineral conflicts with wilderness are highly overrated. As the DEIS states on p.76, "It is highly unlikely" that a mineral find that would significantly effect employment in the San Luis Valley will occur in the WSA.

(3) San Luis Hills is geographically unique as it is the only BLM WSA in the San Luis Valley. No mention is made of the effect on the geographic distribution of wilderness in Colorado designation of the area would have.

Appendix A

November 12, 1982

To: Roz McClellan

From: John Loomis, Economics Dept., Colo. State Univ.

Re: Canon City Wilderness Planning Amendment

First, BLM presents an unequal treatment of benefits and costs of wilderness. The national gains associated with wilderness are direct gains. The national losses are potential. The two cannot be compared. Not only are the direct gains usually larger than the potential losses, but the direct gains will likely occur whereas the potential losses may never occur.

Local losses are just transfers from one region of the state to another. There is no net loss if a job is lost in one place since if there is a demand for whatever that job would have produced it will be produced somewhere else. Both Lower and Upper Grape Creek have direct benefits in excess of direct costs. Thus the nation can be made better off by designation.

Also note that when the document says some dollar amount of investment will be lost if designation occurs they are committing a sunk cost fallacy. Once you make the range improvement, whatever happens in the future, you cannot change the fact the investment has been made. The commitment of resources occurs when the investment was made and designation as wilderness does not change this.

Hope these comments are helpful.

Appendix B

82-60

## STATE OF COLORADO

COLORADO NATURAL AREAS PROGRAM  
Department of Natural Resources

Natural Heritage Inventory  
1750 Lincoln Street, Room 110  
Denver, Colorado 80202  
Phone (303) 860-5887

Richard D. Lamm  
GovernorD. Monte Rector  
Executive DirectorCarol J. Pustmiller, Ph.D.  
Program DirectorMEMORANDUMREPLY FOR  
INVENTORY DATA REQUEST

TO: Carole Pustmiller  
FROM: J. Scott Peterson, Botanist  
Beth P. Lapin, Zoologist  
William L. Baker, Plant Ecologist

DATE:

Plant Communities (PC)  
Aquatic Ecosystems (AQ)  
Special Plants (SP)

Special Animals (SA)  
Geologic Features (GF)

REQUEST NO. 103 PROJECT: Colorado Wilderness Network/BLM WAS's

SPECIAL PLANTS:

None of the WAS's are known to contain any taxa of national or potential national significance. This statement is based upon the fact that none of these areas have been surveyed to any degree for Special Plants. With the lack of knowledge regarding the flora on some of these areas, it would not be improbable to state that previously unknown taxa might occur there. Various plant species of Special Concern that could be found here include the following:

858-814-917 Upper & Lower Grape Creek	<u>Penstemon agassizii</u> USFWS Category 2; Colorado Endemic <u>Eriogonum bradleyi</u> USFWS Category 2; Colorado Endemic
830-208-241 Hardies & Red Cloud Peaks	<u>Gilia pentstemonoides</u> Colorado Endemic <u>Astragalus microcymbus</u> USFWS Category 2; Colorado Endemic
818-683 Skull Creek	<u>Penstemon yampaensis</u> USFWS Category 2; Colorado Endemic
810-887A-887C Black Mt. & Windy Gulch	<u>Astragalus detritalis</u> Regional Endemic

IN COOPERATION WITH





Jack Albright  
Project Manager  
Bureau of Land Management  
Royal Gorge Resource Area  
P. O. Box 1470  
Canon City CO 81212

RESPONSE TO LETTER 83-61

Dear Mr. Albright:

Thank you for your letter.

We are writing to comment on the Draft Environmental Impact Statement on the Browns Canyon Wilderness Study Area (CO-050-002). For the reasons outlined below, we support the BLM's Preferred Alternative A, which would designate 6,614 acres as wilderness.

Browns Canyon is still largely in its undisturbed natural state. Except for a few dirt roads and one or two signs, there is no evidence of any alteration of the original environment. The railroad that borders the west side of the proposed area and follows the Arkansas River is not visible from most of the area and is quickly left behind once you turn into the side canyons.

Browns Canyon's rugged terrain and deep, steep canyons offer outstanding opportunities for solitude. In fact, during a recent hike on a beautiful Sunday, we did not see anyone else in the area. As we worked our way down through the underbrush into Little Cottonwood Creek Canyon, and later picked a path along Spring Gulch, we felt very isolated and quite removed from the pressures of human society.

In addition to naturalness and opportunities for solitude, Browns Canyon offers a variety of outstanding recreational opportunities. The rugged, dry terrain does not offer easy going for the ill-prepared, but challenges its visitors in ways that are difficult to duplicate in more forgiving environments.

Browns Canyon is also valuable wilderness for several additional reasons. The natural and varied ecosystems offer excellent study opportunities for biologists, botanists, geologists, and other professional and amateur naturalists. Browns Canyon is also in an excellent location for a wilderness. Nearby roads provide access, yet only actually border the area in a few places. White-water travel down the Arkansas River offers alternative access to Browns Canyon. In addition, the area is bordered on the east by the Aspen Ridge Roadless Area, which is currently a good wilderness buffer, and may eventually lead to an enlargement of the wilderness area. And finally, we have attached photographs from a trip last spring in order to let Browns Canyon speak for itself.

83-61

-2-

Because of all of these wilderness values, plus the lack of wilderness management problems, the Browns Canyon Area is extremely well suited for wilderness designation. The designation is especially appropriate because of the lack of known mineral values. We therefore support Preferred Alternative A.

Please add this comment to the Hearing Record on the Draft Environmental Impact Statement.

Sincerely,

*Margaret Leavitt*  
Margaret Leavitt

*Alan Lilly*  
Alan Lilly  
140 S. Lafayette  
Denver CO 80209

cc: Senator Gary Hart  
Senator Bill Armstrong  
Representative Pat Schroeder

HILLSIDES ABOVE CANYONS



above Spring Gulch

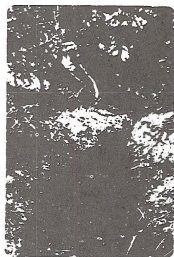


above Little Cottonwood Creek

SPRING GULCH



Near mouth of gulch ...



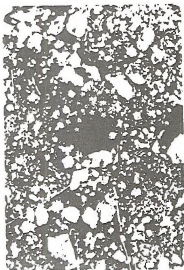
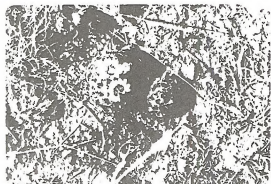
along stream ...

LITTLE COTTONWOOD CANYON



frozen waterfall ..

SPRING WILDFLOWERS IN  
BROWNS CANYON





723 Bridge St.  
Canon City, Colo.  
Dec. 4, 1972

84-62

Dear Sir;

This is in regards to the environmental impact statement considering the wilderness study area of Mt. Stutsman Hills (CO-050-013), Lower Grape Creek (CO-050-014) and Upper Grape Creek (CO-050-017).

As a part time prospector I feel that these three areas should be left as they are because of their mineral content. The areas may not have a promising commercial value but for rock hounds they are very valuable. For people like me, who are partially disabled, the young and older people making these areas a wilderness area would limit our access to the spring areas. Archbonds do comprise a large part of the local population and they are the people who use public lands such as these. They were not mentioned in the study and they should be considered.

Lower and Upper Grape creek is also a great fishing area. By the use of motor bikes or 4-wheel drive vehicles you can follow the old narrow gauge railroad tracks up the creek. Making it a wilderness area would limit this area to only those in good physical shape. The young, disabled, and old would no longer

RESPONSE TO LETTER 84-62

Thank you for your letter.

be able to use these areas. The beauty of this area would be limited to a very few.

Indian artifacts have been found in lower grape creek (which can be seen in the Canon City Museum) and a Mastodon track was found in the upper grape creek area (part of which is in the Westcliff newspaper office). A wilderness designation would stop future such finds and would deprive us of learning more about our history. This would be a loss to everyone.

I feel that these areas should not be made a wilderness area and if anything more access roads should be established.

Sincerely,  
Tom Gouchard

85-70



## SIERRA CLUB

### Pikes Peak Group

CONSERVATION CHAIRMAN

3113 Paxton Drive  
Colorado Springs, Colorado 80909

December 2, 1982

Mr. Jack Albright, Project Manager  
Bureau of Land Management  
Royal Gorge Resource Area  
P.O. Box 1470  
Canon City, Colorado 81212

Dear Jack:

Enclosed please find information supplementary to my testimony at the October 12 hearings. Please include these comments in the hearing record for the Draft Environmental Impact Statement for the Canon City District. I have enclosed a copy of my previous testimony.

#### BROWNE CANYON

The Pikes Peak Group of Sierra Club strongly supports the Bureau's recommendation of a 5,614 acre Browne Canyon Wilderness Study Area as suitable for Wilderness. Existing wild values, in this rugged and geologically interesting terrain, are high. Developing resources, especially timber, would be difficult, expensive, and environmentally destructive. The area's best condition is as it currently exists, as wilderness. We recommend that the Bureau initiate proceedings to establish a joint management policy with Pike and San Isabel National Forest on Forest Lands adjacent to Browne Canyon. We hope this policy would protect Browne Canyon's wild resources so intimately tied to the Forest lands in the Aspen Ridge area.

#### McINTYRE HILLS

After much deliberation, we propose that this unit, as it meets all of the criteria for designated Wilderness, should be found suitable. The Bureau's Alternative C (15,200 acres) will provide for a pristine Wilderness.

LOWER GRAPE CREEK - UPPER GRAPE CREEK

We disagree strongly with the Bureau's non-recommendation of the Lower Grape Creek and Upper Grape Creek Wilderness Study Areas. After spending many hours in field study in these areas, we definitely find high qualities of solitude and scenery, primitive recreation potential and unique historical elements, wildlife habitat and overall wild condition -- all of which convince us of the importance of wilderness protection for the units.

In contrast to high wilderness values, the developable resource potential of the units are low and do not present the impediment to suitability the Bureau claims. Area values are of "little economic potential" with "most of the good crop prospects in the Grape Creek area....already patented", according to the Environmental Impact Statement-cited Golder Mineral Study. We feel that the small scale range improvements suggested by the EIS could in large part be established by means compatible with wilderness. Spring developments and fences currently exist within wilderness, so why not in Grape Creek? The same is even more true for stream habitat improvements. These activities and wilderness are not mutually exclusive.

Based on our studies, we would recommend two small boundary changes, one in each Wilderness Study Area (see map). In Lower Grape Creek, we propose deletion of about 500 acres west of Sunset City Gulch due to existing nonwilder impact.

1. In Upper Grape Creek (and as profiled in Alternatives C and D), we recommend deletion of about 200 acres which surround the unit only including, thus eliminating lands conflicts. As we propose, acreage for Lower Grape Creek Wilderness Study Area should be approximately 10,750 acres and Upper Grape Creek Wilderness Study Area should be approximately 10,000 acres.

BEAVER CREEK

We are very pleased with the Bureau's suitability recommendations for Beaver Creek. The outstanding wilderness qualities of this Wilderness Study Area have long been recognized by both the Bureau and our Group; among others, Beaver Creek's outstanding wildlife and fishery, its remarkable meadows and ridges, fine opportunities for solitude and pristine wilderness as alone to urban populations make the area one of the most outstanding wilderness candidates on any public lands in Colorado.

We are pleased too, that the city of Colorado Springs has suspended its opposition to a Beaver Creek wilderness, pending the outcome of Clean Air legislation. This reinforces our belief that there is no conflict between Beaver Creek's Class II air designation and future appropriate development in Colorado Springs. Recently the Pikes Peak Area Council of Governments has taken a similar stand in supporting Beaver Creek wilderness.

85-70

There seem for reasons, however, for the Bureau's preferred alternative recommending only 17,000 acres. The lands proposed for exclusion, about 4,000 acres, are pristine, scenic, and both ecologically and geologically an integral part of the unit. With high soil erosion potential and relatively little economic gain for timbering the proposed exclusion, we feel there is no reason to exclude these otherwise suitable lands from wilderness considerations.

There are sound reasons for the boundary deletions, totaling four, as outlined by the Bureau in Alternative D. We support these and propose a 20,750 acre Wilderness Study Area as suitable.

SAND CASTLE

2. We support the Bureau's suitable recommendation of the Sand Castle Wilderness Study Area units totaling 1,644 acres. The resources they share with the Great Sand Dunes National Monument Wilderness make them logical additions to the wilderness system.

SAN LUIS HILLS

While not containing the spectacular interior scenery of Beaver Creek or Grape Creek, San Luis Hills Wilderness Study Area is still undeniably wilderness and should be found suitable, we feel. The unit has unique and unusual qualities not found elsewhere among the Wilderness Study Areas. Its volcanic geology and the presence of the rare ferrous mountain scrub pine vegetation classification distinguish this area from most other Wilderness Study Areas in Colorado. The geographic placement of the unit in the San Luis Valley and the resultant surrounding scenery and another unique dimension, for nowhere else in Colorado can the recreational find the visual experience offered by San Luis Hills.

In addition, the area meets all of the basic criteria for a designated Wilderness. Despite the unit's relatively small size we feel its configuration allows for a manageable wilderness unit. In order to improve manageability, we suggest the acceptance of the Bureau's Alternatives C and D, for a total acreage of 17,000.

In summary, the Pikes Peak Group of Sierra Club's proposal for Wilderness Study Areas in the Canon City District includes at least portions of all studied areas. The unit's size is to establish and study these units are derived from the wilderness Act itself. We feel that all of the units more than meet the Act's criteria for suitability and should be recommended to Congress for designation. These Wilderness Study Areas would all be positive additions to the Wilderness Preservation System. To recommend them is to allow them to become part of one of our nation's most rapidly dwindling resources -- truly wild lands.

Sincerely yours,

John K. Stanfield, Jr. Conservation Chairman, Pikes Peak Group  
Sierra Club

## RESPONSE TO LETTER 85-70

Response 1

There would be little advantage to drawing the northwestern boundary along Sunset City Gulch since this would not omit the portion of the WSA along Goat Park and Marsh Gulch, which has the cumulative impacts of man.

Also the suggested boundary, which only omits the land west of Sunset City Gulch, would not present any different issues or impacts than are currently addressed in the all wilderness alternative. The partial wilderness alternative is addressed only to allow analysis of these differences, not as a recommendation.

Response 2

This WSA is made up of four separate parcels, which are up to 6 miles apart. If designated wilderness, they would not provide logical additions to the existing Great Sand Dunes Wilderness boundary, but rather would add irregularly shaped and sometimes narrow extensions protruding from the existing wilderness. As a result, they would be difficult to administer as wilderness (see Map 2-9).

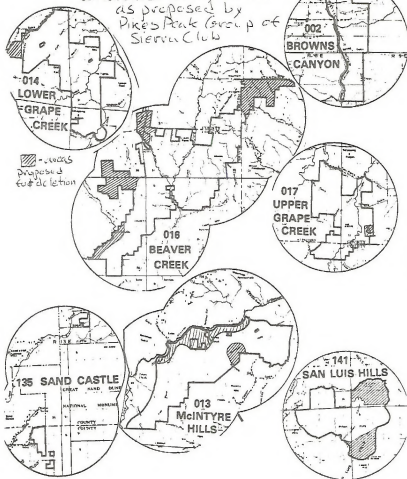
Recently Park Service staff have noticed higher levels of ORV use in and around the WSA than either the Park Service or HLM personnel were previously aware. This ORV use would be difficult to exclude under wilderness designation because of boundary identification problems related to the shifting sands.

As a result of this, and comments from the National Park Service concerning difficulties of wilderness management in the Sand Castle WSA and because the area would provide no significant addition to the scenic, scientific, cultural, or recreational uses of the national monument, the proposed action for this WSA has been changed from Alternative A - All Wilderness Designation to Alternative B - No Wilderness Designation. This would result in 1,644 acres not being recommended for designation.



85-70

Canon City District  
Bureau of Land Management  
Wilderness Study Areas  
as proposed by  
Pikes Peak Group of  
Sierra Club



85-70

TESTIMONY OF JOHN STANSFIELD, CONSERVATION CHAIRMAN OF THE PIKES PEAK GROUP OF SIERRA CLUB, AT WILDERNESS HEARINGS ON CANON CITY DISTRICT, BUREAU OF LAND MANAGEMENT WILDERNESS STUDY AREAS, OCTOBER 1982

I am John Stansfield, Conservation Chairman for the more than 450 members of the Pikes Peak Group of Sierra Club living in southeast Colorado. Our organization has a long-standing interest in the wild lands of the Canon City District of BLM, dating back more than ten years to the time of our Group's first hike into Beaver Creek. Since that time members of our Group have hiked, enjoyed, and studied all of the Wilderness Study Areas (WSA's) (save Sand Castle, I believe) in question at these hearings. We have also actively participated in Lane Use Planning processes and decision-making on the District over the past decade and have hiked and enjoyed many of the non-selected initial inventory and intensive inventory areas here since the inception of the BLM Wilderness Process four years ago. (I personally have been privileged to be a member of the Canon City District Citizens Advisory Board for two years during the Wilderness evaluation.) District staff members have several times presented informational updates of the Wilderness process to our members at our Group's general meetings.

And so, we feel well qualified and informed to comment on the Wilderness Study Areas in the Canon City District and to make our own recommendations regarding their future determination. First, we wish to thank the staff of the District for their generally excellent job of public involvement and information distribution throughout the inventory and study processes. Their efforts are much appreciated by our Group. Their fine field research is one of the bases for our conclusions about the WSA's.

At these hearings we intend to present a capsule view of our proposal, the Sierra Club's Preferred Alternative for the WSA's. In addition, we intend to make a few comments on the Draft Environmental Impact Statement (EIS) as prepared by BLM and the analysis it contains. We intend to present more complete supplementary comments in writing for the Hearing Record at a later date.

Although this EIS (or any other) will never be on the best seller list, it is generally clearly written and well-illustrated. This is very helpful to us and appreciated. The Pike/San Isabel National Forest could take some lessons from the BLM in this area. However, several important aspects in the Unit by Unit Description of Environment are missing or inadequate:

(1) Missing in the Recreation section is the important statement that the WSA's are generally accessible year-round to foot and horse-back travel, a rare attribute in Colorado wilderness:

(2) Inadequate in the Recreation section are recreation day figures which seem questionably accurate. For example, 280 recreation days per year for Beaver Creek is far below what, from our experience, is actual use. It may be two or three times that stated by BLM. Of course, more accurate recreation use figures will also strongly effect economic values attributed to WSA's.

(3) Inadequate in the Wilderness section is the relevancy of vegetative-type comparisons based on the Baily-Kuchler ecosystem. The classifications tend to be so broad as to ignore important vegetative

aspects of the areas. For example, Upper and Lower Grape Creek may fall in the class as stated, but this does not indicate that its vegetative composition, and thus its visual aspects, is unlike any other area in Colorado. The area is unique among Colorado Wilderness and WSA's.

It is in the BLM's Recommended Alternative that individual resources are compared and recommendations made. In the analysis of Lower and Upper Grape Creek and San Luis Hills, we feel that BLM has tended to deemphasize the wilderness values existing in these areas in comparison to developable resources, such as minerals, and projects. Our wilderness sum total for these areas comes out higher than BLM's for numerous reasons. We feel that the Grape Creeks and San Luis Hills qualify for Wilderness recommendation. The information provided in the Draft EIS justifies our viewpoint.

Our proposal for each area is as follows:

Dec. 5, 1982

Dear Bureau of Land Management,

RESPONSE TO LETTER 86-72

Thank you for your letter.

I am a resident of Evergreen, Colorado. I am attending Colorado College in Colorado Springs right now. I have lived in Colorado for 19 of my 21 years of life and have become an avid wildlife enthusiast and environmentally conscious person. Recently, I became aware of your proposals concerning the wilderness designations in the Canon City District of BLM land. I was disappointed to see that only 23,351 acres out of 82,863 acres of land were designated wilderness.

The amount of land with wilderness designation is extremely small in the United States. Wild land, passing over the amount of land that is truly wild, but lacking wilderness qualities, is rapidly diminishing through rapid development. I believe that we need to keep wilderness areas for the other things that animals and plants, which inhabit the earth. They have as much right to live as we do. Moreover, it is a great opportunity to be a person whose man's impact has been virtually non-existent. The mystery of being alive is accentuated in these environments.

The arguments against wilderness designation by the BLM don't outweigh the quality of land use. Timbering, mining, grazing and O.V. usage can be done in many other areas outside these small parcels of land under wilderness consideration. There are plenty of areas where these operations can be undertaken without impinging on wilderness land.

I fully support the Colorado Open Space Council's recommendations concerning the areas of Beaver Creek, Brown's Canyon, Sand Butte, Upper and Lower Dryas Creek

86-72

and Hooty's Hells. I commend your recent recommendations of wilderness designation in the Beaver Creek Area (Project Albionette C), Brown's Canyon and Sand Butte. However, the Upper and Lower Dryas Creek areas are truly wild and offer a unique habitat for rooster nesting and other wildlife activities. I ask you to change your designation of this area to one of wilderness. Moreover, the Sand Butte Hills offer a unique habitat in Colorado for wilderness designation as this area is in a beautiful ecosystem. This ecology here is also unmatched in other surrounding areas.

As a lover of life and natural environments to Oash, the BLM is recommending recommendations with the thought that wilderness is a truly unrenounceable resource just as other mineral and resources are. It has only one chance. Please help us preserve this area!

Thank you,  
Mark Slater  
Mark Slater  
29512 Fairway Dr.  
Evergreen, CO 80439

Please include this statement on the public hearing record. Thank you!

Dec. 1, 1982

## RESPONSE TO LETTER 87-75

To: Jack Albright, Project Manager  
Canyon City District, BLM  
P.O. Box 1470  
Cannon City, CO 81212

From: Hoanling McCallan  
483 Marine  
Boulder, CO 80502

Re: Comments on Cannon City District Wilderness Planning Process

The following is my complete statement, which I summarized in testimony at the October 14 hearing in Colorado Springs. I request that it be made part of the hearing record.

I would first like to express my appreciation of Mr. Albright's efforts to provide the public with a readable document, in the form of a letter, more accessible format. While managers in this direction are certainly welcome, I discovered in the process of carrying the document around a great deal, that the ease of reading it was somewhat counterbalanced by the difficulty of fitting it in to briefings and such. I greatly appreciate the gesture in the right direction, however.

I would like to commend the BLM for its wilderness recommendations on Beaver Creek, Brown's Canyon, and Sand Castle, and for its recognition of the outstanding wilderness values these areas contain. However, I am disappointed in the unsuitable recommendations on Upper and Lower Grape Creeks, San Luis Hills, and McIntyre Hills, due primarily I feel to a predisposition to prior management plans on the part of the BLM.

Despite FIDM's mandate to consider wilderness values of its potential wilderness areas on an equal basis with non-wilderness values, this document betrays a basic bias toward intensive management options and productivity, rather than a full acknowledgment of the significance of natural process left to themselves.

The best example of this in the draft BLM's treatment of Upper and Lower Grape Creeks. Throughout this section we find the double negative phrase repeatedly that wilderness designation would "lose potential increases in" various resources, timber, GSW use, wildlife, etc., without there being a comparable reference to the projected losses of wilderness value (species diversity, solitude, natural plant communities, etc.) resulting from non-wilderness status.

McCallan comments - 5

## 87-75

In the chart on p. 19, for example, there are figures showing losses in GSW use due to wilderness designation, but no corresponding figures showing losses in non-wilderness uses. Likewise, in the unit by unit analysis, starting on p. 52, most of the wilderness and wildlife sections open with a phrase explaining the negative impact of wilderness status on, for example, future timber harvest plans, wildlife habitat values which it would protect. On page 70, the wildlife section on Upper Grape Creek starts by saying: "Wilderness designation would have significant adverse long term impacts on improvements of terrestrial wildlife habitat," rather than "Starting with the wilderness values which would be preserved."

I recommend that the BLM be rewritten to correct this strong negative bias, both in phrasing and in content, in order to comply with the BLM Wilderness Study Policy which states that wilderness values in an area being designated suitable shall be evaluated in the same manner as in an area being recommended as suitable.

Most of the resources which are said in the DEIS to be foregone by wilderness designation, timber, GSW use, minerals, fishing and hunting, are plentifully available in the surrounding area. As is clear from the charts, Upper and Lower Grape Creek do not have high enough potential in any of these resources to represent a significant loss, were it to be designated wilderness. The BLM has not shown a compelling need to open up these resources in an area where critical wilderness values will be foregone, based on a comparative region wide study of the availability of these resources.

Likewise, to lay the mineral argument to rest, it is obvious from the conclusions of the Coker Mineral Study that this area has no minerals in commercial quantities (see attached Summary). Therefore, it seems clear that any justification for a non-wilderness recommendation for Upper and Lower Grape Creek based on a mineral argument would be a transparent capitulation to mineral interests.

The more telling reason for the non-wilderness recommendation of the W.A.M.s, although never explicitly stated in the BLM's plan contained in the management framework plan intended to improve grazing, timber, GSW use, fishing, and game habitat, many of these "improvements" would require road building and use of heavy machinery, causing significant impacts to scenery, solitude, opportunities for back-country recreation, and other wilderness values. Not only are such uses incompatible with wilderness values per se, but are intended to promote wildlife. Noise and surface disturbance associated with wildlife habitat manipulation is unlikely to increase the bird species, much less the wide diversity of nongame wildlife in these areas.

These prior management plans are the driving force behind the wilderness study, as is shown in the conclusions which differ very little from them. The final BLM must show that wilderness has been weighed onto its own merits rather than as an afterthought to the MFP.

## Response 1

Although the DEIS did show losses of potential increases, this FEIS only shows direct losses or increases.

Several changes from the DEIS have been made in this FEIS that respond to all of these comments.

## Response 2

The Coker report covered a 225-square-mile area where the prospects for discovery of significant mineral resources are generally low; however, the potential is identified in both the Coker report (introduction and conclusion/summary) and the Barringer Resources investigation. In particular the following areas within and adjacent to the Lower Grape Creek WSA were identified as having mineral potential: Green Mountain Mine; 2) Copper Gulch; 3) Horseshoe Mine; 4) Goat Park; 5) Sunset City; 6) El Plomo Mine; 7) Columbine Mine; 8) Copper Girl and Valley View. Although currently delineated ore reserves are inadequate to engage in active developments at this time, the potential for development and discovery is quite evident. The developed workings identified in the Coker reports are for the most part confined to the upper oxidized portion of the deposit and very little is known concerning the mineralization at depth. For these reasons and the favorable depositional environment of the area as identified by E. W. Heinrich in "Precambrian Tungsten and Copper-Zinc Skarn Deposits of South-Central Colorado" the area was identified as having potential for mineralization.

## Response 3

The impacts of any projects, activities, or road construction on all resources including wildlife and wilderness are considered in this FEIS.

87-75

It is this question of BLM's plans for habitat improvement which poses the most interesting dilemma for a conservationist, as theoretically the improvement of forage is a common goal, aside from the problem that non-wilderness status invites a plethora of other more damaging uses, such as timber and minerals development, the concept of habitat management is intrinsically counter to the concept of wilderness.

Walking through Lower Grape Creek on a spring morning, and passing through the pools and waterfalls of the lights, one feels above all that this is a place "where earth and its community of life are untrammelled by man, where man is a visitor not does not remain, an area which has been affected primarily by the forces of nature." (1964 wilderness Act)

BLM's view, as expressed in the DEIS, is that an area such as Upper and Lower Grape Creek can, through man's benign (?) intervention, suffer its ecological balance and relationships to be taken apart, rearranged, put back together, and perhaps even improved on.

In the case of Upper and Lower Grape Creek, the small size of the area relative to BLM acreage regions (which remains available for BLM's intensive management plans), along with its location in favor of preservation. Only half of the BLM of Colorado's land area which qualifies as wilderness is currently protected. Areas like Grape Creek and McIntyre Hills, which form a part of this remaining, unprotected wilderness. (We emphatically intend to leave)

More and more such pristine areas will come to be seen as islands of natural diversity, as surrounding regions become developed. Even if all the BLM lands in the state were designated wilderness, they would come to only 1% of state's Colorado land and only 1% of Colorado's land area. Preserving so few remnants of our natural heritage for future generations does not seem like too much to ask.

#### Specific Comments

1. While generally in agreement with BLM's Beaver Creek recommendation, I feel that the ecological integrity of the area requires the inclusion of the 4000 acres south of the Holbert Springs. The timber values of this section are low, and far outweighed by the benefits to geologic, recreational and wildlife resources that inclusion would allow. I recommend Alt. C for Beaver Creek.
2. BLM's recreation day figures of 280 recreation days per year are too low.

3. I am pleased the BLM affirmed its earlier recognition of Canyon as a quality primitive area through its wilderness recommendation.

4. In the care of Sand Castle, wilderness designation of this tiny, 1,644 acre unit is likely to conflict with and compromise the adjacent Great and Dunes National Monument.

McClellan comments 4

87-75

5. The final DEIS should include references to studies showing that in fact the types of vegetative manipulation being planned by the BLM to improve deer and turkey populations will indeed lead to significant increases in these populations. Also a statement needs to be made as to whether the limiting factor of winter range has been taken into account in these projections.

6. With recent cutbacks in BLM funding for non-commercial resources, how do we know that funding for their elaborate and ambitious plans will be there when the time comes? In a time of uncertain future funding, wilderness management could be the most efficient, cheapest way to conserve resources.

7. Wilderness designation promotes the long-term viability of some of the multiple uses (habitat, watershed, scenery, species diversity, cultural, history, scientific resources, grazing, hunting, primitive recreation, natural plant communities) than it restricts. Non-wilderness status leaves an area open to minerals development and timbering, which can be seen as single uses, since they preclude other uses.

8. Traditionally the BLM has seen its lands primarily as serving human purposes. The Canyon City DEIS reflects this attitude and needs to be rewritten to better conform with the intent of the BLM wilderness study policy which states "In addition to its value as a setting for primitive recreation or solitude, wilderness can also provide a range of benefits to other multiple resource values....water quality, wildlife habitat, etc." (FWS/O-78/5, 1106)

9. To what extent would "potential increases in wildlife" produced by these improvements be offset by the timber, ORV, and possible mineral usage of these areas, not to mention by the rising and mechanized scenery for the improvements themselves? How would the existing diversity of wildlife be affected?

10. To what extent could the improvements proposed by the BLM be carried out within the wilderness management guidelines, through non-mechanized methods. Already working is in being done in Upper Grape Creek through labor-intensive techniques.

11. Habitat improvement plans for Upper and Lower Grape Creek are part of the larger Arkansas Habitat Management Plan, which covers 612,480 acres, region-wide. The removal of Upper and Lower Grape Creek, McIntyre Hills, and Beaver Creek, and Brown's Canyon from this plan would remove only 11% of the acreage from this plan. Whether than being a detriment, maintaining the presence of naturally occurring wildlife populations is not only advisable as a means of keeping a control area in the middle of wilderness habitat manipulation, but would provide a refuge for bent and mountain lions and other ranging animals escaping from the impacts of habitat improvement.

12. I suggest that with the recommendation for wilderness designation for Upper and Lower Grape Creek, the BLM consider the possibility of clearing off the road that separates them, going from west side Gulch to East Gulch to preserve the continuity of the two areas.

#### Response 4

The 280 annual recreation days of hiking, backpacking, and fishing shown in the DEIS for the Beaver Creek WSA have been increased to 700 annual recreation days in the FEIS. This increase from the DEIS is based on more recent observations.

#### Response 5

Recently Park Service staff have noticed higher levels of ORV use in and around the WSA than either the Park Service or BLM personnel were previously aware. This ORV use would be difficult to exclude under wilderness designation because of boundary identification problems related to the shifting sands.

As a result of this, and comments from the National Park Service concerning difficulties of wilderness management in the Sand Castle WSA and because the area would provide no significant addition to the scenic, scientific, cultural, or recreational uses of the national monument, the proposed action for this WSA has been changed from Alternative A - All Wilderness Designation to Alternative B - No Wilderness Designation. This would result in 1,644 acres not being recommended for designation.

#### Response 6

There are a number of studies on pinon-juniper conversion and the effect on wildlife (Short, Evans, and Packer, 1977; Terral, Spilllett 1975; Scott, Boeker, 1977; Reynolds, 1964; Short, McCullough, 1977; USDA, Forest Service, 1982).

Winter range has been considered in the projection of wildlife increases.

#### Response 7

To meet the objectives of multiple use management, it is necessary to have these plans to give use direction. Total funding for all projects is rare; however, as money is made available, implementation of projects occurs using a priority listing of these projects as guidance.

#### Response 8

An effort has been made, in the FEIS, to project the location of potential mines or resource projects and associated access roads. Chapter 4 discusses the impacts of these projects on wildlife and other resources.

#### Response 9

Some projects would be compatible with wilderness and could, therefore, be constructed whether or not a WSA is designated wilderness. However, some projects may be more expensive to construct in a wilderness area because of necessary mitigation measures or restrictive access. Other projects may be very difficult to do without mechanical equipment to carry materials or construct the project. When the level of difficulty or cost of a project, such as aquatic habitat improvement projects, reaches a certain level it is no longer feasible to construct.

#### Response 10

Wilderness is not considered detrimental to wildlife in this document. However, the present habitat condition in the areas is generally poor from the standpoint of habitat diversity. In some areas it is planned to improve the habitat through pinon-juniper manipulation so more vegetation/habitat types are present; e.g., mountain shrub, meadow, and grassland. Most animals inhabiting the pinon-juniper type will have suitable, perhaps improved, habitat after treatment, provided areas are left for escape cover and edge effect. The small amount of wilderness study areas being planned for conversion would not have a significant effect on those species such as black bear, which prefer mature pinon-juniper forests. Generally habitat manipulation projects that increase mule deer populations would be beneficial to mountain lion.



## 87-75

ago  
13. Several years/sightings of Bald Eagles and Golden Eagles were common in the Grape Creek area. Although not reported since, the area still supports a variety of raptors, including prairie falcons, kestrel falcons, red tail hawk, and cooper hawk. The area also contains excellent natural nesting sites for the peregrine falcon. Incidents of ORV use, the use of heavy equipment for water cement, timber and other projects, on these and other species are not adequately addressed in the A/EIS.

14. EIM's cost/benefit figures for the various alternatives (especially since this affects taxpayers) should be included with cost/benefits to the private sector.

15. Only 10% of McIntyre Hills contains productive timber resources. Rather than force the wilderness resources of the whole area, because of the productivity of this small portion, I recommend partial wilderness recommendation. Alternative C, which would keep approximately half of this timber resource available for harvest, while preserving the outstanding opportunities for solitude this area offers.

16. The BMS proposes increases in Grape Creek in both wildlife and motorable use. Since both uses can be concentrated near the stream, are they not mutually incompatible?

17. Except for the obvious historic value of the old railroad bed which runs along Lower Grape Creek, the BMS largely omits reference to other supplemental scientific, ecological, and educational values these units contain.

18. Little information is said to exist on the amount of archeological resources in any of these areas. Apparently the required Class II Cultural Resources Inventory has not been performed. This needs to be completed before release of the final EIS. If funding cutbacks are at the heart of this deficiency, this should be made known to the public.

19. In not recommending Grape Creek and McIntyre Hills for wilderness, the BMS may be laboring under a competitive attitude with the Forest Service in which these areas are not seen as "top quality" wilderness. In this context it is important to remember that scenic value is not a requirement for wilderness, rather it is a supplemental value. Recognizing the very few remaining pristine areas in Colorado, offering unusual opportunities for solitude and primitive recreation, all these areas merit wilderness designation.

20. As with Brown's Canyon and Aspen Ridge, there exists a future possibility of upgrading Upper and Lower Grape Creek and the Adjoining Pioneer Peak Forest. Areas 8, 11, and 12 are jointly managed wilderness areas. BMS should take the lead in this by recommending its 2 W.A.s for wilderness designation.

21. BMS should do a regional analysis showing whether the timber, mining, hunting, fishing, recreation, and ORV resources it proposes to develop in these units could equally well be generated in nearby areas with less impact on unique and irreplaceable resources.

McClellan comments 6

## 87-75

22. Despite local concerns about economic losses due to wilderness designation of San Luis Hills N.W., various arguments favor the inclusion of this unit in the National Wilderness Preservation System. As one of only two units representing the rugged mountain shrub prairie vegetation classification in the state, and in the only unit in south central Colorado, it would add both ecological and geographical diversity to state and national wilderness areas.

23. San Luis Hills has many other unique attributes qualifying it for wilderness designation, including uplifted exhumed volcanic hills, with sweeping vistas of the San Luis Valley, the volcanic dome to the north in New Mexico and the San Juan. It provides the only cover for wildlife in many miles, and because of its aridity supports a piñon-juniper woodland at an elevation where one would normally expect to find a conifer forestation.

24. San Luis Hills supports a wide variety of wildlife, antelope, horned lark, piñon jay, rock dove, sage's sparrow, mountain chickadee, rock-bonneted nuthatch, mountain bluebird, western kingbird, kestrel, marsh hawk, horned owl, red-tailed hawk, and golden eagle.

25. San Luis Hills lends itself to numerous recreational opportunities, such as hiking, photography, hunting, wildlife observation, etc. It also provides off-season backcountry opportunities during the spring and fall when tourist activity areas are snow-bound.

26. I recommend the inclusion of San Luis Hills in this suitable recommendation with the adoption of the North Sant portion deleted in Alternatives C and H which is more impacted by mineral activities.

27. Wilderness use in Colorado is growing by 5-10% annually. With some wilderness areas already closed to ORV and wilderness areas expected to reach capacity in 2005, Canyon City wilderness areas are needed to absorb the overflow and to assure that opportunities for solitude and wilderness recreation exist for the next generation.

28. Colorado's 1981 Outdoor Recreation Plan indicates a high need for wilderness use in Regions 4 and 13, comprising nearby counties.

29. At a preservation value of \$81 per acre (wild and scenic) Upper and Lower Grape Creek are worth \$175,500 to Colorado citizens on their intrinsic wilderness essence alone.

30. The BMS claims that based on the Bailey-Kuchler system of vegetation classification, these W.A.s do not add significantly to the diversity of the wilderness system. This neglects the obvious geologic contribution these areas have to make in the form of unique granite canyons which characterize Grape Creek, McIntyre Hills and Weaver Creek.

## Response 11

Closing this road would eliminate access to a 900-acre inholding of public land that has been omitted from the WSA because of mining scars and exploration pits. Currently this road, which is cut and filled in several places and maintained, provides vehicle access to these recently worked exploration pits and 10 mining claims. In addition current fishing use totaling over 100 annual angler days would be eliminated.

## Response 12

Although bald eagles and golden eagles occur in the Royal Gorge Resource Area as winter visitors, none are known to nest in either the Upper or Lower Grape Creek WSAs. Also, peregrine falcons could stop in any of the WSAs during their migration, but are also not known to nest in the Upper or Lower Grape Creek WSAs.

As described in Chapter 1, wildlife habitat and populations could be affected by resource management actions proposed or anticipated within the WSAs if not designated as wilderness. The impacts from all resource management actions proposed or anticipated within the WSAs were considered. If the total acreage of vegetation were manipulated as proposed by all resources, small game and nongame species composition and numbers would vary locally. However, composition and numbers would not significantly change in the long term because of the habitat diversity offered by public lands, the dispersed nature and size of each project, the nature of disturbance, and the relatively short period of time that heavy equipment would be in each project area.

In addition ORV use is not expected to increase since any additional roads constructed for access to the projects would be closed to the public.

87-75

In conclusion, the DEIS given the impression that the Canyon City BLM District, through an habitual attitude that its lands are to be managed for human purposes, has failed to accurately quantify and assess the wilderness values of its potential wilderness areas, and to realistically examine the tradeoff between alternatives which would, on the one hand provide short-term, productive benefits, and, on the other, maintain long-term flexibility for the maximum number of resources.

I urge the BLM to incorporate into the Final EIS a wilderness analysis which gives full and equal weight to the wilderness values of its few remaining areas which truly possess wilderness characteristics.

Respectfully Submitted,

*Reedine McClellan*

BLM: COKE MINERALS STD;  
by ROBERT J. COKE 87-75  
3/2/82

#### Summary and Conclusions

This report was written and meant to be used in conjunction with the Barringer Resources, Inc., report on the same area. The old mining districts within the study area have some small localized ore zones that could be marginally profitable given 1980 metals prices. At current March, 1982, metals prices the entire area is considered subeconomic. Below are specific conclusions reached after property evaluation.

1. There are approximately 220,000 tons of 2.5% Cu, 1.5% Pb, 1.0% Zn, ore grade material scattered across the study area.
2. About 110,000 tons of this ore is estimated to lie within the Green Mountain shear zone.
3. There are no economical ore bodies south of Green Mountain, Horseshoe-Columbine Mine shear zones.
4. The barite in South Grape Creek is of too poor grade to be valuable.
5. The copper prospects around Cotopaxi have some potential for valuable minerals.
6. Most of the good Cu prospects in the Grape Creek Area are already patented.
7. There is evidence of a continuous shear zone from Dawson Mountain Workings (Copper King, etc., patented claims) to the Columbine Mine (a distance of 4.3 miles) that may be of some economic value. Ore grades are generally too low to be economical at this time, and the shears are narrow and tend to pinch out locally.
8. Overall the entire area has little economic potential. The mineral occurrences are small and, though locally of fairly high grade, are generally low grade in character.
9. To put the area into production would require a custom mill in the area. If all the small Cu prospects were to be brought back into operation simultaneously, the chances for economic success would still be marginal and short lived due to low grade and reserves.
10. There are possibilities for small heap leaching operations at several of the minesites. Local recovery of Cu via heap leaching would be the only viable alternative at this time, providing environmental restrictions can be met and/or overcome.

#### Response 13

The economic gain to the local and regional economy as a result of wilderness designation or nondesignation of all WSAs would change by less than 1 percent. Therefore, the impacts on economic conditions were dropped from further analysis in the FEIS. Further discussion on impacts on economic conditions is in Chapter 1 of this FEIS.

#### Response 14

Although management had at one time considered a motorized trail along Grape Creek, it has been decided that if the Lower Grape Creek WSA is not designated wilderness, back-country vehicle use would not occur along Grape Creek and this is reflected in this FEIS. As a result no conflict between back-country vehicle recreation and wildlife would occur.

#### Response 15

Without knowing the supplemental scientific, ecological, and educational values to which this comment refers, it is difficult to respond specifically.

Special features including ecological, geological, scenic, and cultural features, as well as scientific and educational values, have been considered for each WSA. However, as stated in Chapter 1 of this FEIS, Lower and Upper Grape Creek are the only WSAs with identified special features. As a result special features are only discussed for these two WSAs in Chapter 3.

#### Response 16

A Class I (existing data) inventory was performed and is considered to be sufficient basis to estimate the importance of the cultural resources in the WSAs.

Nowhere in the Wilderness Study Policy (Federal Register, Vol. 47, No. 23) is a level of documentation mentioned for cultural (prehistoric) values.

The State Historic Preservation Officer is in concurrence with our approach (see Letter 16-95 and Chapter 1).

It should also be noted that development on public lands requires inventory and mitigation for cultural resources, thus providing legal protection, which occurs whether or not an area is designated as wilderness.

Response 17

The contribution that these projects would make has been analyzed in a regional perspective in this FEIS by providing regional comparisons to timber production, wildlife numbers, etc., where such a comparison is relevant to the analysis.

December 4, 1982

Mr. Jack Albright  
Bureau of Land Management  
Royal Gorge Resource Area  
P.O. Box 1470  
Canon City, CO. 81212

RESPONSE TO LETTER 88-76

Thank you for your letter.

Dear Mr. Albright:

I would like to comment on the Canon City District Wilderness Planning Amendment Draft Environmental Impact Statement (DEIS). Bureau of Land Management areas in Colorado are among the finest examples of the nation's desert and canyon wildlands. The areas under your jurisdiction and included in this DEIS, namely Beaver Creek, Upper and Lower Grape Creek, Brown's Canyon, Sand Castle, San Luis Hills, and McIntyre Hills are no exception. These areas exhibit outstanding wilderness characteristics and potential for wilderness designation.

To begin with, I wholeheartedly support your wilderness recommendation for Brown's Canyon. This area, combined with the Forest Service area Aspen Ridge, is a rugged, pristine ecosystem. I applaud your decision on this area.

You should also be commended for your wilderness recommendation of Sand Castle. This area is an excellent addition to the Great Sand Dunes area.

I will concur with your decision concerning the fate of McIntyre Hills.

Unfortunately, that is where the "love affair" ends. I must say that I am extremely disappointed with your recommendations for the remaining four areas.

Let us begin with Beaver Creek. I do not agree with your preferred Alternative D. I do not believe that the 4,000 acres south of Wolbert drainage should be excluded. This area is an integral part of the larger Beaver Creek ecosystem. I would rather see Alternative C as the preferred alternative which includes all of the original acreage except for three hard-to-manage spur and a heavily used area.

page two 88-76

I would also urge you to reconsider your position on San Luis Hills and recommend that it be included in the National Wilderness Preservation System. I recognize the mineral potential of the area but it is very clear that similar minerals are found nearby, whereas the unique geologic and plant values of this unit are irreplaceable.

Last, but certainly not least, are the Upper Grape Creek and Lower Grape Creek areas. Since the Coker minerals study concluded that this area has "little economic potential" there is no reason to see mineral use as a major threat or conflict. Timber is definitely not a conflict--especially since Forest Service areas are not profiting with timber sales (you do not expect the BLM could do any better, do you?) Grazing is compatible with wilderness, so that leaves ORV use as the only real conflict. Since there are plenty of roaded, wild areas for ORV use I do not see any conflicts with wilderness designation for this area. The area contains historic relics, scenic views, opportunities for solitude and unconfined types of recreation, and is definitely natural in character. I would urge the exclusion of the SE section of Upper Grape Creek.

I sincerely hope that these comments have reached you in time to be considered in the Final Environmental Impact Statement. I am looking forward to the issuance of the FEIS and any reconsideration on your part concerning Beaver Creek, San Luis Hills, and Upper and Lower Grape Creek.

Thank you for this opportunity to comment.

Sincerely,

*Sheryl A. Kinner*  
Sheryl Kinner  
2260 Floral Dr.  
Boulder, CO. 80302

December 5, 1982

89-78

Jack Albright  
Project Manager  
Royal Gorge Resource Area  
BLM  
P.O. Box 1470  
Canon City, CO 81212

RESPONSE TO LETTER 89-78

Thank you for your letter.

Dear Mr. Albright,

I am writing to support wilderness designation of the seven wilderness study areas considered in the Draft Wilderness Planning Amendment. I highly commend the BLM for recognizing the unique and outstanding wilderness qualities of the Browns Canyon and Beaver Creek areas, but several other valuable areas have been ignored because of marginal resource values and an overcautious emphasis on resource development. These WSA's are but a small fraction of the BLM lands available for resource development, yet they are the last remaining acres of wild desert and coniferlands in this part of Colorado, and deserve protection as wilderness.

I fully support your recommendation for designating 6,614 acres of Browns Canyon as wilderness. The area is most valuable for its important wildlife habitat and recreational opportunities, while its ruggedness precludes economically viable development.

I support Alternative C for Beaver Creek, which would designate 20,750 acres as wilderness. This alternative incorporates the entire Beaver Creek ecosystem while eliminating portions that would be difficult to manage. I oppose the further deletions proposed in Alternative D, because those

December 5, 1982  
page 2

89-78

boundaries exclude an integral part of the Beaver Creek ecosystem where marginal timber values are heavily outweighed by the wildlife, recreational, and wilderness qualities. I oppose deleting the acreage along Phantom Canyon for motorized recreation, because there are plenty of areas available for that type of activity, whereas few wild areas remain where the sights and sounds of human activity can be avoided.

I concur with the BLM recommendation for Sand Castle, as this area will complete the Sand Dunes ecosystem of which it is an integral part.

I was most disappointed by the discussion of the upper and lower Grape Creek areas. The BLM's emphasis on development of marginal timber, mineral, and forage resources and on motorized vehicle use totally overshadows the exceptional wildlife values of these areas. The Colter mineral study concludes that the areas have little economic potential yet the BLM has used minerals as a major justification for excluding the areas from wilderness consideration. Similarly, the timber resource does not justify the areas' exclusion. I support protection of the wilderness qualities of the Grape Creek areas through designation of the entire acreage, excluding the Sunset Gulch area of lower Grape Creek and the small southeastern portion of upper Grape Creek containing inholdings.

I was also disturbed by the discussion of the San Luis Hills area. Again, marginal mineral values are used to justify exclusion of the area. Similar minerals with a greater potential for economical exploitation are found elsewhere. However, the San Luis Hills is the only roadless area in southern Colorado that remains for wilderness consideration after the drastic cuts made through the inventory. It would provide a unique and needed addition to the National Wilderness Preservation system, as it is one of only two Colorado WSAs representing the fescue mountain mucky ecosystem. As a resident of the San Luis Valley, I heartily urge the BLM to reverse its recommendation on the San Luis Hills.

I also urge the BLM to recommend the McIntyre Hills area for wilderness.

I have had the opportunity to hike in each of these WSAs, with the exception of the Sand Castle area, and can attest to their outstanding wilderness qualities and opportunities for solitude and primitive recreation. The BLM should be proud to have the opportunity to protect these fine areas. I hope you will follow my recommendations.

Please include this letter within the official wilderness hearing record.

Sincerely,  
Nancy Strong  
Route 1  
Antonito, Colorado 81120

90-79

RESPONSE TO LETTER 90-79

Thank you for your letter.

Bureau of Land Management  
Royal Gorge Resource Area  
P.O. Box 1470  
Canon City, CO 81212

2324 14th St.  
Boulder, CO 80302

December 4, 1982

I am writing in response to the Draft Environmental Impact Statement Wilderness Planning Amendment. I was not able to attend the hearings but would like my comments to be part of the hearing records.

I strongly support your wilderness recommendations for Beaver Creek and Browns Canyon. I was very disappointed to see the non-wilderness recommendation for Upper and Lower Grape Creek. I had the opportunity to visit these areas on two different occasions this past spring and found them to possess outstanding wilderness qualities. The topography of these areas provided endless interesting hikes and explorations.

A general criticism I have of the DEIS is that the value of wilderness appeared to be secondary to other resources such as minerals and timber. How is it that we as a society have forgotten the value of letting natural processes be. I believe that wilderness designation is a step in the right direction for appreciating nature for what she is.

Thank-you for this opportunity to comment.

Sincerely,

S-109

*John H. Hylton*





PLEASE NOTE OUR NEW ADDRESS:

91-81

12640 West Cedar Drive  
P.O. Box 15638  
Denver, CO 80215

Jack Albright, Project Manager  
Bureau of Land Management  
Royal Gorge Resource Area  
P.O. Box 1470  
Canon City, CO 81212

December 7, 1982

RESPONSE TO LETTER 91-81

Thank you for your letter.

Dear Mr. Albright:

This letter constitutes the written comments of the Minerals Exploration Coalition (MEC) on the Draft Wilderness Environmental Impact Statement on the wilderness study areas within the Royal Gorge, Saguache, and San Luis Planning Units of the Canon City District. The MEC represents mineral exploration companies and individuals conducting hard mineral exploration on federal land.

In view of the fact that wilderness areas designated after December 31, 1983 will be withdrawn from appropriation under the mining and leasing laws, we believe that all areas with mineral and energy potential should be excluded from wilderness designation, even though no economic deposit is now known. The withdrawal limitations will preclude collection of new data and new areas of mineral potential will not be found. With new discoveries effectively stopped, the policy of excluding all currently known mineral potential from wilderness should be followed, so that exploration of these areas will not be restricted and minerals might yet be produced. Explorationists tend to look at the long term because the lead time of discovery may be ten to fifteen years. The impact of wilderness on minerals should be assessed over the long term (a century or more). We believe that land use decisions should be in conformity with the policy statements made in the National Minerals Program Plan and Report to Congress released by the President in April, 1982.

Browns Canyon - The wilderness character seems to be limited inasmuch as a railroad track comprises three-fourths of the western boundary, old mines and cabins exist and a roadway crosses the area. The roadway has three-quarters of a mile of cut and fill indicating road building, therefore, it does not have wilderness character.

The wilderness study area is mineralized as indicated by past production and the current existence of 17 mining claims. These claims, which constitute property rights, and areas of mineral potential that may be developed in the future, should not be included in the wilderness.

The MEC believes that this area is not suitable for wilderness designation.

780 WEST TENNESSEE AVE., SUITE 103 • DENVER, COLORADO 80223 • (303) 722-2235

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Canon City District (12/7/82)

91-81

Mc Intyre Hills - This WSA seems to have limited wilderness character because of the proximity of the highway, the evidence of activities of man, and state and private in holdings.

The mineralization in pegmatite minerals, tungsten and uranium, may be limited and uneconomic at the present time with the depressed minerals prices but future exploration and better prices could reveal a significant mine. The split ownership of the surface and subsurface could be a problem as indicated by recent court decisions and the administrative decision to remove these areas from WSA's.

The MEC agrees with the preferred alternative of nonsuitable for wilderness designation.

Lower Grape Creek - The presence of numerous mine workings and constructed roads and other works of man indicate that this area does not have wilderness character.

The area has significant mineral potential with considerable exploration on 67 mining claims. The patented claims are private property and the owner has valid rights to use the property, including rights of access. The administration of these claims, including determination of valid existing rights in the event of wilderness designation, would be difficult.

The possibility of discovering an economic mineral deposit should not be preempted by wilderness designation. We agree with the preferred alternative of no wilderness designation.

Beaver Creek - The reduction of the area from 26,150 acres to 17,000 acres appears to designate a compact manageable area free of mineral potential. If no mineral potential is found during the mineral survey by the U.S. Geological Survey and the U.S. Bureau of Mines at a later date, the MEC would support preferred alternative of 17,000 acre partial wilderness designation.

Upper Grape Creek - This WSA has potential for several minerals: copper, lead, barite, molybdenum, ilmenite, apatite, magnetite and the strategic mineral chrocoite. These minerals are explored on 148 mining claims which amount to about 29 percent of the surface.

This area should remain open for exploration. The MEC agrees with the preferred alternative of no wilderness designation.

Sand Castle - If no mineral resource potential is identified by the U.S. Geological Survey - U.S. Bureau of Mines mineral survey to be conducted later, the MEC would favor the preferred alternative of all wilderness designation, as additions to the existing Great Sand Dunes Wilderness.

91-81

A recent Interior Board of Land Appeals decision may change the status of these small tracts (less than 5,000 acres) proposed for attachment to pre-existing wilderness areas.

San Luis Hills - This MSA lacks wilderness character because it is small, near a population center, has many nearby roads, and a 640-acre in holding.

An altered intrusive body and anomalous copper provides significant evidence of the possible existence of a porphyry copper deposit. The exploration interest in the northeast portion of the area and the presence of 85 claims indicates that this MSA should remain open for exploration.

The MEC favors the preferred alternative of no wilderness designation.

Thank you for the opportunity to comment on this draft environmental impact statement.

Sincerely,

MINERALS EXPLORATION COALITION

*John D. Wells*

John D. Wells  
Managing Director

92-82

M. Havens  
1300 30th St. D10-16  
Boulder, CO 80303  
Dec. 6 '82

RESPONSE TO LETTER 92-82

Thank you for your letter.

Jack Albright  
Bureau of Land Management  
Royal Gorge Reservoir Area  
Box 1470  
Canon City, Co. 81212

Hello Mr. Albright,  
I am terribly dismayed at BLM priority to resource development, ignoring (or negative evaluation) of wilderness values.

This bias will certainly mean destruction of our already diminishing wilderness. The values of our wilderness are not fairly assessed. The value of beauty, potential for solitude, quality of clean air and water, the diversity of plant & animal species & other unique opportunities that only wilderness provides are priceless, and should NOT BE PAID OFF TO THE FOOLS OF INDUSTRY WHO ARE BLIND TO THESE, BUT ONLY SEE THE POTENTIAL BANK ROLL OF MINING, DEFORESTATION AND OTHER POLICIES OF DESTRUCTION.

I am writing to strongly urge you to use the office of BLM to protect these diminishing wilderness areas from the powerful developers, instead of supplying their greedy desires.

Very Sincerely,  
M. Havens  
Boulder, Colorado

Dear Jack Albright,

Thank you for the opportunity to comment on Beaver Creek. Please include my comments in his hearing record.

RESPONSE TO LETTER 93-83

Thank you for your letter.

This summer I camped and hiked in the area. Opportunities for solitude, pristine ecosystems, and great wildlife habitat were in abundance. The terrain is so rugged that I often couldn't see my friends when they were only 150 feet away. <sup>side</sup> ~~away~~ from the main trail, there was no evidence of man's presence. Bighorn tracks and scat were frequent sights.

Many people were enjoying the area, but we would only notice them at the parking lot. Families, bowhunters, couples, small game fishermen, Boy Scouts, and rafter/nature ~~were~~ <sup>hangers</sup> ~~from~~ ~~there~~.

The air quality was so fine that we saw the Northern Lights.

The timber resource was not so great. Also, the slopes are frequently so steep that logging or road construction would

93-83

cause much erosion leading to increased siltation in the stream. The siltation could harm <sup>the</sup> fishery.

By including both the upstream and downstream parts of the W.S.A., we have a chance to protect 2 adjacent, yet different ecosystems. The upstream part is rugged basement rock next to ridges and ravines of scruboak and pinyon juniper. The downstream part has sedimentary rock in canyons with more vegetation. It's flatter and there aren't significant amounts of timber.

Sincerely,

Jim Morris  
Po Box 2308  
Boulder, CO 80306

+

David Wulden  
1975 Avenue  
Boulder, CO 80302

December 5, 1982

Bureau of Land Management  
Royal Gorge Resource Area  
P.O. Box 14970  
Cafon City, CO 81212

RESPONSE TO LETTER 94-84

RE: Draft Environmental Impact Statement Cafon City District  
Wilderness Planning Amendment

Thank you for your letter.

We wish to commend Jack Albright, project manager, and his capable staff for their dedicated efforts to involve the public, and the innovative and practical format for the presentation of the study's findings. Also, throughout the entire process Ken Smith has been a gracious and responsive contact.

We have the following observations and comments to make concerning the DEIS:

Summary: "Seven wilderness areas, totaling 52,666 acres have been identified by the Bureau of Land Management in the Cafon City District. Of these, 25,298 acres are proposed to be recommended for inclusion in the National Wilderness Preservation System." One must remain cognizant of the fact that 25,298 acres is not the amount of wilderness in the Cafon City District; it is 52,666 acres and no additional judgment stated or implied in the DEIS can change that reality. While words and combinations of words such as "considerable interest (by miners, etc.)", "would prohibit", resource conflict", "manageability" and "potential development" imply some sort of modification of status, they do not change this wilderness reality and it is folly to suggest that they do.

Regarding specific areas, we support the BLM's preferred alternative of all wilderness designation for Brown's Canyon and Sand Castle, but we feel that Lever and Upper Grapes Creek are also deserving of the same designation.

The BLM's preferred alternative for Beaver Creek (D) over Alternative C is particularly disturbing for us and judgments made in the DEIS indicate that thorough study of this quality area has not taken place. Therefore, the justification of the preferred alternative is not only weak, it is nonexistent. The 4,000 acres which have been deleted in (D) have never been in question in any of the previous discussions with the Bureau or with the public. Their removal at this stage of the process is, indeed, mystifying.

The BLM can not justify using 75,670 cords of firewood which would be prohibited from being harvested when, in fact, those cords will always be untenable; this is forbidding terrain which is very there are no roads in it now and firewood has never been available. Surely the Bureau does not intend to provide funds for access through private property and for road building into inaccessible areas for potential firewood gatherers.

94-84

The deletion of 4,000 acres in the southwest portion because of manageability implies that the BLM currently employs a "management forest" or will soon hire one -to manage this wilderness! ("Let see, we could get by with one platoon if we logged off those 4,000 acres.") If private land-owners started providing access for "manageables" when, traditionally, it has been in their best interest to deny access -these the wilderness quality- that could be dealt with. However, there is no more intention of that happening than there is that potential firewood gatherers would be willing to hire helicopters for removal of wood. We suspect that this entire area is currently managed by one secretary and an occasional foray into the field by other personnel.

Recreational conflicts confuse the issue; that was taken care of in Alternative C with the elimination of the area along Phantom Canyon -a wise decision but one which should not become part of the rationale to justify Alternative D.

We urge the BLM not to disavow the days and days of study supported by the plethora of information available from the Col. Wilderness Study Group, the COSE Wilderness Workshop, the Sierra Club, the American Wilderness Alliance, and our own good counsel. (We're the ones who hire 7 miles down the road the ones who lost it head of settle up there for a month this fall and had to hire an airplane to find them -that's wilderness, for sure.)

Our recommendation for Beaver Creek is, unequivocally, Alternative C, and we urge that the BLM re-evaluate its position and submit (C) as the preferred alternative.

Sincerely,  
  
Eric and Harvey Kelly

cc: Senator Gary Hart  
Senator William Armstrong  
Representative Ken Kramer  
Representative Ray Kogovsek



## COLORADO MOUNTAIN COLLEGE

11 December 1982

RESPONSE TO LETTER 95-85

Mr. Jack Albright, Project Manager  
Bureau of Land Management  
Royal Gorge Resource Area  
Box 1470  
Canon City, Colorado 81212

Dear Mr. Albright:

I would like to make several comments for inclusion in the hearing record for the draft Environmental Impact Statement concerning Wilderness designation for several portions of the Royal Gorge Resource Area.

I am pleased that the BLM has looked at several unique roadless areas, and suggested that portions of them become part of our Wilderness System. I am disappointed, however, that the Bureau's recommendations are far short of protection for all the areas available. It appears that the Bureau's recommendation lean toward development, rather than protection, for too many parts of the available roadless areas.

I am very much in favor of your recommendation for Brown's Canyon. This area, with its rugged terrain, deserves to be part of our Wilderness System.

I would urge you to recommend wilderness status for the San Luis Hills. With its unique and irreplaceable ecosystem. Since the forest-mountain scrub-prairie vegetation class is now rare in its natural state, this area should be protected, and not destroyed or altered by development.

The Beaver Creek area, with its close proximity to the urban areas of Colorado Springs, should also become a wilderness area. As the Front Range continues to grow, this area will become more and more important for its wilderness values. Now is the time to provide protection for it.

I agree that the Sand Castle area is needed for wilderness, to round out the Great Sand Dunes area. Any other use for these two units would not be desirable.

Again, I am pleased with some of the recommendations you have made, but feel that you have recommended too little. There are many other areas which are available for development, but too few which still have the character of wilderness. You have the opportunity to add unique and irreplaceable ecosystems to the Wilderness System. I urge you to do so.

Yours truly,  
*James Campbell*  
James Campbell, PhD  
Professor of Outdoor Studies

EAST CAMPUS  
LEADVILLE, COLORADO, 80461  
303-485-0715



WEXPRO COMPANY

70 SOUTH STATE • P.O. BOX 11070 • SALT LAKE CITY, UTAH 84141 • (801) 580-2800

LEGAL DEPARTMENT

96-88

December 15, 1982

Mr. Jack Albright  
Project Manager  
Bureau of Land Management  
P.O. Box 1470  
Canon City, CO 81212

Dear Mr. Albright:

We appreciate the opportunity to comment on the Draft Environmental Impact Statement for the Canon City District's Wilderness Planning Amendment.

We note in Chapter IV there is a section titled "Assumptions Used for Impact Analysis." The section says, in part: "Current values were utilized for recreation and other resources. These are not anticipated to be constant over time, but expected changes are not readily quantifiable." Energy minerals would seem to qualify in the "other resources" section of the assumptions. Yet, as we examined the alternatives, we could discern no meaningful statement of the value which should have contributed to energy's proper role in the impact analysis.

The Environmental Impact Statement says in part:

"... There appears to be no potential for oil and gas or coal."

"... Rock units suitable for source or reservoir formation are not known to exist in the area."

"... due to a complete absence of exploration or interest this value is believed to be minimal."

"There has been no known interest in the resource potential for oil and gas, coal, phosphate, or geothermal within the WSA. The geologic setting, lack of suitable source, and reservoir formations make the potential for these minerals unlikely."

"... This area is believed to have very limited potential for any leasable mineral."

"An unexplored sedimentary section exists below the lower unit of this WSA. There is some possibility that oil and gas exist."

Response 1

This WSA is made up of four separate parcels, which are up to 6 miles apart. If designated wilderness, they would not provide logical additions to the existing Great Sand Dunes Wilderness boundary, but rather would add irregularly shaped and sometimes narrow extensions protruding from the existing wilderness. As a result, they would be difficult to administer as wilderness (see Map 2-9).

Recently Park Service staff have noticed higher levels of ORV use in and around the WSA than either the Park Service or BLM personnel were previously aware.

This ORV use would be difficult to exclude under wilderness designation because of boundary identification problems related to the shifting sands.

As a result of this, the proposed action for this WSA has been changed from Alternative A - All Wilderness Designation to Alternative B - No Wilderness Designation. This would result in 1,644 acres not being recommended for designation.

"Some gas has been reported in the San Luis Valley. The existence of oil and gas in the WSA is possible but not probable."

This information is sketchy at best. It also seems to be predicated almost entirely upon surface geologic evaluation. We believe a more scientific investigation of the areas should be made before any lands are allocated to Wilderness.

RESPONSE TO LETTER 96-88

Response 1

All WSAs recommended for wilderness designation are surveyed for mineral values by the U.S. Geological Survey and Bureau of Mines. In this FEIS, only Browns Canyon and part of Beaver Creek are recommended for wilderness designation. In both cases, using the best available information, the U.S. Geological Survey and Bureau of Mines have concurred that these WSAs have low mineral potential with the exception of a small perlite deposit in the Browns Canyon WSA.

We believe it is unsatisfactory to plan for long-term Wilderness classification using only surface evaluations and assumptions based on lack of exploration and "interest." Your assumptions may, in the long run, prove to be accurate. But until the areas are properly explored, using the latest geological and geophysical technology, there is really no way to be sure. Wilderness planning must be based in science for one important reason: areas have been designated Wilderness by the Congress since passage of the Wilderness Act in 1964. Since that time almost 80 million acres have been made part of the Wilderness system; not one acre has been declassified or even proposed for declassification.

Colorado already has 2.6 million acres of designated Wilderness. With the Forest Service and BLM making additional proposals for Wilderness based on land management planning, we believe a great deal of care must be taken to recommend only those areas which add unique values to the wilderness system. We appreciate your stated objective to consider public comment in conjunction of a wilderness study area.

We urge that you modify your planning to provide for more specific consideration of energy and mineral potential. One way to do this is to use the "Mineral Rating System" developed by Rocky Mountain Oil and Gas Association, Denver. RMGA is also working on better ways to evaluate mineral potential for incorporation into benchmarks analyses in land management plans. We feel sure RMGA would be pleased to discuss these systems with you at your request.

Thank you again for the opportunity to comment.

Very truly yours,

Ruland V. Hill, Jr.  
Attorney

RUG:wb

97-89

RESPONSE TO LETTER 97-89

Response 1

All WSAs for wilderness designation are surveyed for mineral values by the U.S. Geological Survey and Bureau of Mines. In this FEIS, only Browns Canyon and part of Beaver Creek are recommended for wilderness designation. In both cases, using the best available information, the U.S. Geological Survey and Bureau of Mines have concurred that these WSAs have low mineral potential with the exception of a small perlite deposit in the Browns Canyon WSA.

The final decision on what WSAs will or will not be designated wilderness will be made by Congress.



Roberta Anderson  
Public Lands Coordinator

Amoco Production Company (USA)  
Denver Region  
Denver Building  
17th & Broadway  
Denver Colorado 80202  
303-430-4274

December 17, 1982

Mr. Jack Albright  
Project Manager  
Bureau of Land Management  
Royal Gorge Resource Area  
P. O. Box 2470  
Canon City, Colorado 81212

Dear Mr. Albright:

Re: Royal Gorge/Saguache/San Luis Resource Area Draft Environmental Impact Statement for the Canon City District Management Framework Plan Wilderness Amendment

Amoco Production Company is a wholly-owned subsidiary of Standard Oil Company (Indiana). Our principal job is exploring for and producing oil and gas throughout the United States. We appreciate the opportunity to comment on the Canon City District Management Framework Plan Wilderness Amendment.

We apologize for being late with our comments on the Proposed Draft Environmental Impact Statement for the Canon City District Wilderness Planning Amendment. We examined the alternatives in the document and could find no meaningful statement as to the value which contributes to energy minerals proper role in your impact analysis. The information that you use in the document is sketchy at best and also seems to be predicated almost entirely upon surface geologic evaluation. We believe a more scientific investigation of the areas must be made before any lands are allocated to wilderness. It is, of course, unsatisfactory to plan for long-term wilderness classification using only surface evaluations and assumptions based on lack of exploration and "interest." Even though current leasing interest may be low, surprises are routine in the oil business and we hesitate therefore to endorse any withdrawal unless the case for wilderness designation is overwhelmingly the obvious choice, and the trade-offs which may be necessary are worth the price.

Colorado already has 2.6 million acres of designated wilderness. With the Forest Service and BLM making additional proposals for wilderness based on their land management planning processes, we believe a great deal of care must be taken to recommend only those areas which add unique values to the National Wilderness Preservation System. We appreciate your stated objective to consider public comment in conjunction with "a full analysis of multiple resource and socio-economic values and uses of a wilderness study area."



97-89

Mr. Jack Albright  
December 17, 1982  
Page 2

We urge that you modify your planning to provide for more specific consideration of energy and mineral potential. We hope that you might participate in the use of the "Minerals Rating System" developed by the Rocky Mountain Oil and Gas Association, Denver. RMOGA is also working on better ways to evaluate mineral potential for incorporation into bench mark analyses in land management planning. We feel sure the Association would be willing and pleased to discuss these systems with you at your request.

Thank you again for the opportunity to comment.

Sincerely,

  
Roberta Andersen

RA:WV

JAMES G. FELT, P.C.

ATTORNEYS AT LAW

411 SOUTH CASCADE

COLORADO SPRINGS, COLORADO 80903

98-90

JES G. FELT  
JES G. WITTE

December 17, 1982

TELEPHONE  
(303) 471-1212

Jack Albright  
Project Manager  
Bureau of Land Mgt  
Royal Gorge Resource Area  
P.O. Box 1470  
Canon City, CO 81212

RE: Proposed Beaver Creek Wilderness Area

Dear Mr. Albright:

The City Council of the City of Cripple Creek, Colorado has asked me as its City Attorney to write to you concerning the proposal of the Bureau of Land Management for the Beaver Creek Area to be designated a wilderness area. The first and foremost is that the City Council is very supportive of the concept that the area should be a non-motorized vehicle recreation area allowing for backpacking and hunting uses as well as a wildlife propagation area.

However, there are some distinct concerns of the Cripple Creek community.

1. It is our understanding that under the wilderness designation, there is a higher air quality requirement, at least in the sense that it requires governmental review of pollution control devices that there may be in the area. Clearly, Cripple Creek and the surrounding area are an economically distressed area which any additional governmental requirements as to air quality could not be met by tax-payer dollars. Likewise, the economy of the area tends, to a large extent, upon the health of the mining industry in the Cripple Creek/Victor area, and should the mining industry be likewise placed under such regulations and therefore be required to comply with those, it is the City Council's strong feeling that it would be detrimental to the economic life of the area as it would cause the closing of many mines.

RESPONSE TO LETTER 98-90

Response 1

The air quality in the Beaver Creek WSA is presently designated Class II under the Federal Clean Air Act. The designation of an area as wilderness does not change the air quality standards for that area. A recommendation for wilderness designation is not a recommendation for stringent air pollution controls. If this WSA is designated wilderness by Congress, nothing would necessitate a reclassification to Class I. The BLM Wilderness Study Policy states, "The Department of the Interior will not recommend reclassification to the more strict Class I in connection with future wilderness recommendations . . . air quality reclassification is the prerogative of the states. . . ." Such a decision would be made by the state of Colorado, not BLM. Therefore, the potential for redesignation is independent of wilderness status of the area.

Jack Albright  
December 17, 1982  
Page Two

- 2 2. It is our understanding that no mineral study has been done of the area. Again, since our economic life depends to a large extent upon the mining industry, we believe that a mineral study should be done to make it clear that it is an area which is not economically feasible to develop minerals.
- 3 3. Finally, the City Council of Cripple Creek is very concerned that we may not be totally familiar with all of the economic and social impacts that might be struck upon the city and our community should the wilderness classification be granted, i.e. there may be other areas of governmental control that will be placed upon the surrounding area as a result of having to keep the wilderness area in its pristine state, which would be economically unfeasible for the community of Cripple Creek, including but not limited to water quality, flood control, vehicular traffic in the immediate area, dust control, operation of sanitary landfill, noise control, permitted uses of the area (i.e. hunting and fishing), and the like. Hence, it would be valuable to our city and community if someone could be made available from your office to answer questions concerning the proposed wilderness.

For these reasons, then, we are concerned about the wilderness area and would request your consideration in adding this letter to the public comment and in further contact with you to educate the people in our area. Thank you for our consideration in this matter.

Very truly yours,

  
James C. Felt

JGF:raw  
cc Norbie Larson

#### Response 2

Of the entire 26,150 acres in the Beaver Creek WSA, 20,750 acres are recommended for wilderness designation.

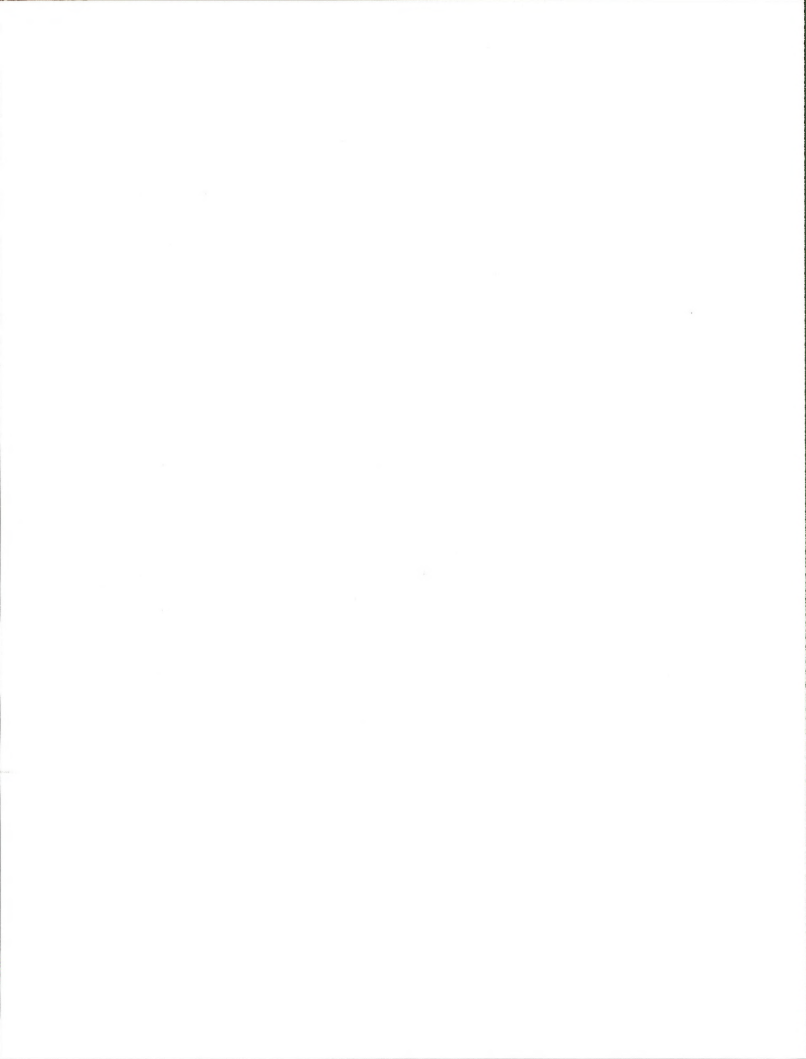
Both the U.S. Geological Survey and Bureau of Mines have surveyed the Beaver Creek WSA for mineral values and have concurred there is low mineral potential in this WSA.

#### Response 3

As a result of wilderness designation, there would be no restrictions of this kind on any land outside the WSA. The only place where uses would be restricted would be within the WSA. We would be happy to answer any questions you may have concerning wilderness designation.



## **SUPPORT DATA**



# SUPPORT DATA

## LIST OF PREPARERS

The draft environmental impact statement was prepared by 27 people within the BLM, Canon City District in Colorado. Names, assignment, education, and years of experience are listed below:

Name	Assignment	Education	Years of Experience
Committee	Team Leader Final EIS		
William Schneider	Co-Team Leader (Revision) Recreation, Visual, & Wilderness	BA-Geology MS-Recreation	17.0
Ken Smith	Co-Team Leader Draft EIS	BS-Park Management MS-Park & Public Management	6.5
Dave Taliaferro	Co-Team Leader Draft EIS	BS-Recreation Administration MS-Recreation Resources	13.5
Tom Sieverding	Core Team Member	BS-Forestry; graduate work-Silviculture	22.0
Dennis Zachman	Technical Coordinator	BS-Outdoor Recreation Management	8.5
Bev Neuben	Editor	On-job-training; formal training; sessions on English; grammar, letter writing, and format	12.0
Roger Underwood	Geology, Minerals, & Topography	BS-Geology	10.0
Kevin Andersen	Geology, Minerals & Topography	BS-Geology	7.0
James Sazama	Range Resources	BS-Wildlife Biology MS-Range Management	7.5
Royce Wheeler	Range Resources	BS-Range Management	16.0
Paul Trentzsch	Forestry Resources	BS-Forestry	10.0
Bill Miller	Forestry Resources	BS-Forestry	10.0
Erik Brekke	Wildlife Resources	BS-Wildlife Biology	6.0
John Schwarz	Wildlife Resources	BS-Wildlife Science	13.0



# SUPPORT DATA

## LIST OF PREPARERS (Continued)

Name	Assignment	Education	Years of Experience
Don Prichard	Wildlife Resources	BS-Fishery Biologist	6.0
Robert Addison	Soils & Air Resources	BS-Agronomy (Crops & Soils)	17.0
Howard Wertsbaugh	Hydrology	BS-Watershed Management	20.0
Gary Rutherford	Economic	BS-Latin AM-History MS-Urban Planning MS-Agricultural Economics	4.0
Barbara Schmalz	Social	BA-History/Sociology/German MA-Sociology	11.0
Stuart Parker	Lands Uses	BA-Economics	13.0
John Beardsley	Cultural Resources	BA-Anthropology	8.0
Dave Hallock	Planning	BS-Forestry	8.0
Victoria Sounart	NEPA & CEQ Compliance & Cultural Resources	BUS-Anthropology/Geography	6.0
Jack Albright	Previous Project Manager	BS-Agronomy (Range Management)	14.0
Gene Vecchia	Previous Core Team Member	BS-Forest/Range Management	21.0
Elner Rush	Typing and Clerical Support	Business College; Administration	16.0
Terry McGinniss	Typing and Clerical Support (Backup)	Business College; Administration	10.0
Cynthia Giles	Typing and Clerical Support (Backup)	Business and Office Education; Administration	6.0
Kathryn Tober	Artwork on Cover	Free Lance	2.0

### Canon City District Support

Ade Neisius - Quality Control  
 Glenn Wallace - Quality Control  
 Aalice Knox - Administrative Support

### Colorado State Office Support

Eric Finstick - Wilderness  
 Susan Derr - Cartography  
 Gerald Halladay - Art  
 Leigh Wellborn - Graphics  
 Linda Mechura - Coordinator  
 (Word Processing/Typesetting)

## SUPPORT DATA

### DEIS MAILING LIST

Following is a list of groups and agencies who were sent a copy of the DEIS with a request for comments and input. Colorado Congressional delegation and all individuals who requested information on the wilderness studies received a copy of the DEIS. Federal, state, and local agencies not responding are indicated by an asterisk. A copy of the document was sent to the U.S. Geological Survey and Department of Energy; however, no responses were received.

A complete list of letters received is shown in Chapter 5 prior to the letters and responses.

#### Federal Agencies

Department of the Interior  
 Bureau of Mines  
 Bureau of Reclamation  
 U.S. Fish and Wildlife Service  
 \*Geological Survey  
 National Park Service

Advisory Council on Historic Preservation

Department of Agriculture  
 Forest Service  
 \*Soil Conservation Service

Department of Defense  
 U.S. Air Force

Department of Energy  
 \*Federal Energy Regulatory Commission

\*Department of Transportation

Environmental Protection Agency

#### State Agencies

Colorado Department of Natural Resources  
 \*Colorado Geological Survey  
 Colorado Division of Wildlife  
 \*Colorado Soil Conservation Board  
 \*Colorado Water Conservation Board  
 \*Colorado Board of Land Commissioners  
 \*Colorado Oil and Gas Conservation Commission  
 Colorado Division of Parks and Recreation  
 Colorado Division of Water Resources  
 \*Colorado Division of Mines  
 Colorado Division of Planning  
 Colorado Department of Local Affairs  
 Governor's Clearing House - Colorado

#### Local Agencies

Pikes Peak Area Council of Governments  
 \*Pueblo Council of Governments  
 \*San Luis Valley Council of Governments  
 \*Upper Arkansas Valley Council of Governments

#### Counties

\*Alamosa County  
 \*Chaffee County  
 Conejos County  
 \*Costillo County  
 \*Custer County  
 El Paso County  
 \*Fremont County  
 \*Huerfano County  
 \*Lake County  
 \*Las Animas County  
 \*Park County  
 Pueblo County  
 \*Rio Grand County  
 \*Saguache County  
 Teller County

#### Cities

\*Alamosa  
 \*Antonito  
 \*Buena Vista  
 \*Canon City  
 Colorado Springs  
 \*Florence  
 \*Fountain  
 Pueblo  
 \*Salida  
 \*Silvercliff  
 \*Westcliff

## SUPPORT DATA

DEIS MAILING LIST (Continued)

### Interested Organizations/Groups/Companies

The Wilderness Society	Atlas Corp.
The Colorado University Wilderness Study Group	Gulf Oil Corp.
Upper Arkansas Audubon Society	Mobile Oil Corp.
Fort Collins Sierra Club	Texaco, Inc.
Colorado Springs Sierra Club	Shell Oil Company
Colorado Open Space Council	Conoco
Colorado University Wilderness Society	Cleveland Petroleum
Colorado Adventuring Company	Exxon Corp.
Friends of the Earth	Union Carbide Corp.
Pikes Peak Sierra Club	Metal Mules
Wilderness Audre	Schwendiner Associates
Wilderness Experiences	Anschutz Corp.
Colorado Mining Association	AMOCO Products Company
Izaak Walton League	Atlantic Richfield Company
National Wildlife Federation	Association of Professional Geological Scientists
Colorado Cattleman's Association	Gemini Resources, Inc.
Colorado Woolgrower's Association	Standard Oil Company
National Resources Defense Council	Sunoco Energy Development Company
Rocky Mountain Center on Environment	Red Mountain Clay Company
Trout Unlimited	Independent Petro Association of AM
Colorado Historical Society	Accent Energy Corp.
Colorado Outward Bound	Harrison Western Corp.
American Wilderness Alliance	ASARCO, Inc.
Aspen Wilderness Workshop	Continental Oil Company
Club 20	Sunedco
Colorado Association 4 WD Club	Kellogg Corp.
Colorado Mountain Club	Inspiration Development Company
Colorado Outfitter and Ranch Enterprise	Wexpro Company
Public Lands Institute	Cyprus Mines Corp.
Wildlife Management Institute	Moly Corp., Inc.
Aquila Energy Company	Urania Exploration Inc.
AMOCO Minerals Company	U.S. Borax
AMOCO Production Company	

## GLOSSARY

- Allotment Management Plan (AMP).** A concisely written program of livestock grazing management, including supportive measures, if required, designed to attain specific management goals in a grazing allotment.
- Acre-Foot.** A unit for measuring volume, equal to the quantity of water or other material required to cover 1 acre to a depth of 1 foot or a volume of 43,560 cubic feet.
- Adit.** A horizontal or nearly horizontal passage driven from the surface for the working or unwatering of a mine. If driven through the hill or mountain to the surface on the opposite side, it would be a tunnel.
- Alluvium.** Unconsolidated rock or soil material deposited by running water, including gravel, sand, silt, clay, and various mixtures of these.
- Animal Unit Month (AUM).** The forage needed to support one cow, one horse, or five sheep for a month or one elk, five deer, or five antelope for the same period of time (1800 lbs./AUM on a 50 percent utilization basis).
- Anomalous.** Deviating from the normal or common order.
- Aquatic.** Living or growing in or on the water.
- Back-country Vehicle.** Any motorized vehicle for cross-country travel over land, water, sand, snow, ice, marsh, swampland, or other terrain.
- Baily-Kuehler Ecosystem Map.** Map that identifies ecosystems and landforms in WSAs and provides a broad synthesis of current knowledge about the ecosystem geography of the country.
- Class I Air Quality.** Minimal additional deterioration in air quality is permitted.
- Class II Air Quality.** Moderate additional deterioration in air quality (most BLM lands).
- Clean Air Act, as amended by 1977.** An act giving EPA the overall responsibility to protect air quality and to set ambient/emission standards. It also gives each state the primary responsibility to meet the standards through the development and implementation of a state implementation plan.
- Contiguous.** Lands or legal subdivisions having a common boundary; lands having only a common corner are not contiguous.
- Cultural Resources.** Those fragile and nonrenewable remains of human activity, occupation, or endeavor, reflected in districts, sites, structures, buildings, objects, artifacts, ruins, works of art, architecture, and natural features, that were of importance in human events.
- Ecosystem.** Collectively, all populations in a community, plus the associated environmental factors.
- Endangered Species.** Any species in danger of extinction throughout all or a significant portion of its range.
- Environmental Assessment (EA).** A report analyzing the impacts of some proposed action on a given environment. It is similar to an environmental impact statement (EIS) except it is generally smaller in scope and makes recommendations for action. EAs are sometimes preliminary to EISs.
- Eolian.** Pertaining to, caused by, or carried by the wind.
- Ephemeral.** Something short-lived or transitory.
- Erosion.** The process by which soil particles are detached and moved.
- Firewood.** For comparison USFS firewood figures are given in Chapter 4. The USFS figure their unspecified volume (firewood) as 30 percent of sawlog volume, figured at 2 cords per Mbf.
- Forb.** Herbaceous plants—neither grass nor resembling grass.
- Game Species.** Those species commonly harvested either for sport or profit.
- Gneiss.** A banded or foliated metamorphic rock, usually of the same composition as granite, in which minerals are arranged in layers.
- Graben.** An unusually elongated depression of the earth's crust between two parallel faults.
- Habitat.** A specific set of physical conditions that surrounds the single species, a group of species, or a large community. In wildlife management, the major components of habitat are considered to be food, water, cover, and living space.
- Habitat Management Plan (HMP).** A written and approved activity plan for a geographical area of public lands identifying wildlife habitat management actions to be implemented in achieving specific objectives related to planning document decisions.
- Impact.** The effect, influence, alteration, or imprint of man within the WSA.
- Imprint.** A mark or evidence left by man.
- Inholding.** Non-Federal lands surrounded by a WSA.
- Intensive Forest Management.** A program of action designed to secure the best practicable use of the forest resources by using current and proper forest management to accomplish a desired result.
- Intensive Range Management.** A program of action designed to secure the best practicable use of the forest resources by the manipulation of livestock grazing to accomplish a desired result.
- Intrusion.** A feature (land and water form, vegetation, or structure) that is generally considered out of context with the characteristic landscape.
- Listed Species.** Any species of fish, wildlife, or plant, which is designated as endangered or threatened under the Interagency Cooperation-Endangered Species Act of 1973.
- Management Framework Plan (MFP).** Land use plan for public lands, which provides a set of goals, objectives, and constraints for a specific planning area to guide the development of detailed plans for the management of each resource.
- MSA.** See Management Situation Analysis.
- Management Situation Analysis (MSA).** An analysis by the Bureau of Land Management used for making land management decisions that are responsive to public issues to determine the capability of public land resources. This is available for review in the Canon City District Office.
- Mbf.** Thousand board feet.
- Naturalness.** Condition of an area that generally has been affected primarily by forces of nature with the imprint of man's work substantially unnoticeable.
- Nongame Species.** Those species not commonly harvested either for sport or profit.
- Operable Acres.** Productive forest land on slopes of 35 percent or less that has no restrictions placed on it that would preclude timber harvesting.
- Outstanding.** Standing out among others of its kind; conspicuous; prominent. Superior to others of its kind; distinguished; excellent.
- Pegmatite.** A coarse-grained igneous rock, large granite, sometimes rich in rare elements such as uranium, tungsten, and tantalum.
- Permeability.** The condition of being porous; containing openings or interstices through which outside processes can pass.

## SUPPORT DATA

### GLOSSARY (Continued)

**Pinon-juniper Manipulation.** Any altering of pinon-juniper woodland stands (i.e. controlled burns, firewood cutting) where an objective is being met. Examples of objectives could be removing mature trees to release young trees or to increase forage production for livestock or wildlife.

**Primitive and Unconfined Recreation.** Nonmotorized and undeveloped types of outdoor recreational activities.

**Productive Forest Land (PFL).** Forest land that is producing or capable of producing 20 cubic feet of wood per acre per year.

**Public Land.** Land administered by the Bureau of Land Management.

**Raptor.** Bird of prey.

**Recreation Days (Annual)** - For the purpose of this assessment, annual recreation days were calculated using the following formula:

$$\frac{\text{Ave. Daily Visits} \times \text{Duration Spent}}{\text{Participating in Activities (in hours)}} + 12 \times \frac{\text{Length of Season (days)}}{\text{(hours)}}$$

**Recreation Visit.** The entry of one person into a specific area or site for purposes of engaging in one or more recreation activity.

**Residuum.** Something remaining after removal of a part.

**Rocky Mountain Forest Province.** Geographic area identified within the Bailey-Kuchler Ecosystem and containing all the wilderness study areas in the Canon City District. It consists of pine-Douglas-fir forest, western spruce-fir forest, saltbrush-greasewood, or fescue-mountain muley-prairie vegetative classification.

**Rotation Age.** The age at which a crop of timber reaches the specific condition of either economic or natural maturity and should be harvested.

**Sediment Yield.** The amount of sediment given up by a watershed over a specified time period, usually a year. Ordinarily, it is expressed as tons, acre-feet, or cubic yards of sediment per unit of drainage area per year.

**Soil Association.** A mapping unit used on general soil maps, in which two or more defined taxonomic units occurring together in a characteristic pattern are combined because the scale of the map or the purpose for which it is being made does not require delineation of the individual soils.

**Solitude.** The state of being alone or remote from habitations; isolations. A lonely, unfrequented, or secluded place.

**Sustained Yield Timber Production Base.** The amount of timber that is managed to achieve and maintain in perpetuity a regular periodic output of timber.

**Terrestrial.** Living or growing on land; not aquatic.

**Threatened Species.** Any species that is likely to become an endangered species within the foreseeable future throughout all or a significant portion of its range.

**Unit Resource Analysis (URA).** The system of data gathering and analysis that precedes land use planning for public lands (see Management Framework Plan).

**Valid Claim.** The appropriation of public lands open to mineral entry at the time of location containing the discovery of a valuable mineral deposit subject to location under the Mining Laws of 1872, as amended (17 stat. 91). A discovery exists when a valuable mineral is found in such quantity and quality that a person of ordinary prudence would be justified in the further expenditure of his labor and means with a reasonable prospect of success in developing a valuable mine (Prudent Man Rule). The mineral involved must be either intrinsically valuable or be determined to be an uncommon variety capable of being mined, removed, and disposed of at a profit (Marketability Test).

**Valid Existing Right.** A mining claim validated by a discovery is real property and conveys all of the rights and privileges granted by law. These rights and privileges, prior to patent, are subject to the limitations imposed by applicable laws, rules, and regulations. Claims located prior to the establishment of a wilderness designation are entitled to a finding of fact on the issue of timely discovery either as of the date of establishment of the wilderness or December 31, 1983, or both.

**Visitor Use.** Visitor use of the wilderness resource for inspiration, stimulation, solitude, relaxation, education, pleasure, or satisfaction.

**Visual Resource.** The land, water, vegetative, animal, and other features that are visible on all lands.

**Way.** A path or course maintained solely by the passage of vehicles. A "way" is not a road.

**Wilderness Study Area (WSA).** A roadless area, which has been found to have wilderness characteristics (thus having the potential of being included in the National Wilderness System), and which has been subjected to intensive analysis by the Bureau and public review to determine wilderness suitability and is not yet the subject of a congressional decision regarding designation as wilderness.

**Woodland.** Forested land not capable of producing commercial sawtimber but can and does produce forest products like firewood, transplants, posts and poles, etc.

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